VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT

669 County Square Drive
Ventura, CA 93003
805/645-1400

PART 70 PERMIT

Number 0012

Permit Term: January 1, 1998 to December 31, 2002

Company Name / Address	Facility Name / Address
Tenby, Inc. P.O. Box 258 Oxnard, CA 93032	Tenby, Inc. 3450 East Fifth St. Oxnard, CA 93032
Mr. Morley Chase CEO 805/487-4698	Mr. Richard Nali Title V Contact 805/483-2760

The Part 70 permit consists of this page and the tables, attachments and conditions listed in the attached table of contents. The Part 70 permit application is included for reference only and is not a part of the Part 70 permit.

Pursuant to Rule 33.1, the Part 70 permit shall also serve as a permit to operate issued to fulfill the requirements of Rule 10.B.

For:

Karl E. Krause, Manager
Engineering Section

Richard H. Baldwin
Air Pollution Control Officer

TENBY INC.
PART 70 PERMIT NO. 0012
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Note: The Part 70 permit application is included for reference only and is not a part of the Part 70 permit.

2. PERMITTED EQUIPMENT AND APPLICABLE REQUIREMENTS TABLE

Purpose

The purpose of this table is to list the emissions units at this stationary source that are permitted to operate pursuant to Rule 10, "Permits Required" and Rule 23, "Exemptions From Permit". The table also provides a list of requirements that are specifically applicable to these emissions units. Permit conditions that enforce these requirements are listed in Section No. 7, "Specific Applicable Requirements" and Section No. 8, "Permit Specific Conditions" of this permit.

In addition to the emission unit specific requirements in Section No. 7 and Section No. 8, there are additional general requirements that may apply to the emissions units listed in this table, or to the stationary source as a whole. Furthermore, some general requirements may apply to emissions units or short-term activities not required to be specifically listed on the permit. These general requirements are contained in the following sections of the Permit: Section No. 9, “General Applicable Requirements”; Section No. 10, “General Requirements for Short-Term Activities”; Section No. 11, “General Permit Conditions”; and Section No. 12, “Miscellaneous Federal Program Conditions”.

Equipment Description

This portion of the table provides a brief description of the permitted equipment at this stationary source. Attached to the table is a "Title V Equipment List Description Key" that contains definitions and explanations for some of the standard terminology used in the equipment description.

Applicable Requirements

The applicable requirements portion of the table is a matrix of applicability for the specific requirements that apply to the listed emissions units. The columns are labeled with APCD rule numbers or references to federal requirements. An "X" in the row corresponding to the emissions unit indicates the requirement is specifically applicable to that unit. For cases where a rule has multiple compliance options, a number appears instead of an "X". The number is a code key that corresponds to the "Title V Applicable Requirement Code Key" attached to the table. The code key table contains specific citations for the portions of the rule that are applicable. The code key is also used to identify the permit attachment in Section No. 7 , "Specific Applicable Requirements", that contains the associated permit conditions. For example, code key "1" under Rule 71.1 is associated with Attachment 71.1N1 in Section No. 7.

Permit specific conditions are identified with a "PC" followed by a number in the column labeled "ADD REQ" (additional requirements). A "PC#" in the row corresponding to the emissions unit indicates that the permit specific condition is specifically applicable to that unit. The “PC#” also corresponds to the permit attachment in Section No. 8, "Permit Specific Conditions", that contains the permit specific requirements.

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Permit to Operate No. 0012
Permitted Equipment and Applicable Requirements

M:\TITLEV\LOTUS\AR_0012P 27-Apr-98 Equipment	71.1	71.3	74.1	74.15.1	ADD. REQ.
Indirect Process Heat					
1 - 20.0 MMBTU/Hr NG/FO Erie City Boiler (7) Lo Nox (36 PPM)			1		PC1, PC3
1 - 4.0 MMBTU/Hr NG/FO Boiler (5) Standby UNC				4	PC1
1 - 4.5 MMBTU/Hr NG/FO Boiler (6) Standby UNC				4	PC1
1 - 3.0 MMBTU/Hr NG/FO Boiler (1) Standby UNC				4	PC1
1 - 3.0 MMBTU/Hr NG/FO Boiler (4) Standby UNC				4	PC1
1 - 3.15 MMBTU/Hr NG/FO Boiler Standby UNC (3500 Tank Farm)				4	PC1
1 - 3.15 MMBTU/Hr NG/FO Boiler Standby UNC (3500 Tank Farm)				4	PC1
1 - 3.15 MMBTU/Hr NG/FO Boiler Standby UNC (3500 Tank Farm)				4	PC1
1 - 3.15 MMBTU/Hr NG/FO Boiler Standby UNC (3500 Tank Farm)				4	PC1
Solids Recycling and Disposal System					
1 - 150 BBL Slop Tank (TC-14) VR	1				PC1
1 - 500 BBL PWT (501) VR	1				
1 - 500 BBL PWT (502) VR	1				
Produced Gas Sweetening System					
1 (or More) - Nitrite Solution Vessels					PC2
Portable Steam Generators for Thermally EOR					
1 - 20.0 MMBTU/Hr NG Steam Generator (0) Lo NOx			1		PC1, PC5
1 - 20.0 MMBTU/Hr NG Steam Generator (1) Lo NOx			1		PC1, PC5
1 - 20.0 MMBTU/Hr NG Steam Generator (2) Lo NOx			1		PC1, PC5

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Permitted Equipment and Applicable Requirements

M:\TITLEV\LOTUS\AR_0012P 27-Apr-98 Equipment	71.1	71.3	74.15	74.15.1	ADD. REQ.
1 - 20.0 MMBTU/Hr NG/FO Steam Gen. (3) Lo NOx			1		PC1, PC5
1 - 20.0 MMBTU/Hr NG/FO Steam Gen. (4) Lo NOx			1		PC1, PC5
1 - 20.0 MMBTU/Hr NG/FO Steam Gen. (5) Lo Nox			1		PC1, PC5
Production Tank System					
1 - 2000 BBL COST (2001) VR	1				PC1
1 - 2000 BBL COST (2002) VR	1				PC1
1 - 2000 BBL COST (2003) VR	1				PC1
1 - 2000 BBL COST (2004) VR	1				PC1
1 - 2000 BBL COST (2005) VR	1				PC1
1 - 2000 BBL COST (2006) VR	1				PC1
1 - 2000 BBL COST (2008) VR	1				PC1
1 - 2000 BBL COST (2009) VR	1				PC1
1 - 2000 BBL COST (2011) VR	1				PC1
1 - 2000 BBL COST (2012) VR	1				PC1
1 - 2500 BBL COST (C-1) VR (Transamerica Lease)	1				PC1
1 - 2000 BBL COST (C-2) VR (Transamerica Lease @ Texcon)	1				PC1
1 - 2000 BBL COST (C-3) VR (Transamerica Lease @ Texcon)	1				PC1
1 - 30000 BBL COST (30001) VR	1				PC1
1 - 2500 BBL PWT (2501) VR	1				
Process Heater Prior to Separation Tower					
1 - 20.0 MMBTU/Hr NG/FO Natco Crude Oil Process Heater Lo Nox (34 PPM)			1		PC1, PC4

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Permitted Equipment and Applicable Requirements

M:\TITLEV\LOTUS\AR_0012P 27-Apr-98 Equipment	71.1	71.3	74.15	74.15.1	ADD. REQ.
Gas Oil (Diluent) Storage & Injection System					
1 - 1500 BBL Gas Oil Storage Tank (1501) VR	1				PC1
1 - 1500 BBL Gas Oil Storage Tank (1502) VR	1				PC1
1 - 1500 BBL Gas Oil Storage Tank (1503) VR	1				PC1
1 - 700 BBL Gas Oil Storage Tank (701) VR	1				PC1
1 - 700 BBL Gas Oil Storage Tank (702) VR	1				PC1
3500 Tank Farm					
1 - 3500 BBL Gas Oil Storage Tank (3500) VR	1				PC1
1 - 3000 BBL Gas Oil Storage Tank (3001) VR	1				PC1
1 - 3000 BBL Gas Oil Storage Tank (3003) VR	1				PC1
1 - 1500 BBL Gas Oil Storage Tank (1506) VR	1				PC1
1 - 1500 BBL Gas Oil Storage Tank (1507) VR	1				PC1
1 - 1000 BBL Gas Oil Storage Tank (1505) VR	1				PC1
1 - 2000 BBL Gas Oil Storage Tank (2000) VR	1				PC1
Asphalt Tank Heating and Storage					
1 - 4.9 MMBTU/Hr Asphalt Heater (Tank12001) Lo NOx				1	PC1
1 - 4.9 MMBTU/Hr Asphalt Heater (P-1) Lo NOx				1	PC1
1 - 1.0 MMBTU/Hr Asphalt Heater (506) UNC (stndby)				4	PC1
1 - 1.0 MMBTU/Hr Asphalt Heater (Shell 1 & 2) UNC (stndby)				4	PC1
1 - 12000 BBL Asphalt Storage Tank (12001) VR	1				PC1
1 - 2000 BBL Asphalt Storage Tank (2007) VR	1				PC1
1 - 2000 BBL Asphalt Storage Tank (2010) VR	1				PC1
1 - 800 BBL Asphalt Storage Tank (1001) VR	1				PC1
1 - 1000 BBL Asphalt Storage Tank (1002) VR	1				PC1
1 - 1000 BBL Asphalt Storage Tank (1003) VR	1				PC1

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
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Permitted Equipment and Applicable Requirements

M:\TITLEV\LOTUS\AR_0012P 27-Apr-98 Equipment	71.1	71.3	74.15	74.15.1	ADD. REQ.
1 - 1000 BBL Asphalt Storage Tank (1004) VR	1				PC1
1 - 500 BBL Asphalt Storage Tank (505) VR	1				PC1
1 - 500 BBL Asphalt Storage Tank (506) VR	1				PC1
1 - 600 BBL Asphalt Storage Tank (Shell 1 & 2) VR	1				PC1
1 - 3500 BBL Asphalt Storage Tank (3501) VR	1				PC1
Product Sales & Transfer Systems					
1 - Gas Oil Loading Rack BL VR (3500 Tank Farm)		4			PC1
1 - Gas Oil Loading Rack BL VR (1501 -1503 Tank Area)		4			PC1, PC7
1 - Asphalt Loading Rack SF VR (Shell Tanks)		6			PC1, PC6
1 - Asphalt Loading Rack SF VR (12001 Tank Farm)		6			PC1, PC6
1 - Asphalt Loading Rack SF VR (12001 Tank Farm)		6			PC1, PC6
1 - Asphalt Loading Rack SF VR (@ 1002 Tank)		6			PC1, PC6
1 - Asphalt Loading Rack SF VR (@ 3501 Tank)		6			PC1, PC6
1 - Crude Oil Loading Rack BL VR (Transamerica @ C-1 Tank)		4			PC1, PC7
1 - Crude Oil Loading Rack BL VR (Texcon @ C-2,C-3 Tanks)		4			PC1, PC7
1 - Crude Oil Loading Rack BL VR (2005-2006 Tank Area)		4			PC1, PC7
For Use Throughout Leases					
86 - Oil Wells					PC1

TITLE V EQUIPMENT LIST DESCRIPTION KEY

For Title V permits, the Permitted Equipment and Applicable Requirements Table contains a number of terms, abbreviations, and acronyms that have been standardized for oilfield facilities. The following list describes many of the terms on an oilfield equipment list:

Wash Tank A tank that stores and separates oil and water that generally operates with a constant liquid level. It does not have an associated throughput limit.

COST A crude oil storage tank that generally operates with a variable liquid level and has an associated throughput limit. An oil shipping tank that has a truck loading rack is a COST by definition. These tanks may also be known as shipping tanks.

PWT A produced water tank that generally operates with a constant liquid level and does not have an associated throughput limit. These tanks may also be known as free water knock out (FWKO) tanks.

LACT Tank A Lease Automated Custody Transfer tank that operates at a constant or near constant liquid level and does not have an associated throughput limit. This tank is generally equipped with a LACT pump for pipeline oil shipping. A shipping tank with a truck loading rack is not by definition a LACT tank, but is a COST.

Gauge or Test Tank A tank that is used for the purpose of production testing a well or group of wells. This tank is assumed to operate with a variable liquid level and has an associated throughput limit.

Condensate Tank A tank that is used for the purpose of storing water and hydrocarbon liquids recovered from natural gas scrubbers. This tank is assumed to operate with a variable liquid level and has an associated throughput limit.

VR A vapor recovery system that is installed on a tank, loading rack or loading facility, glycol dehydrator, or other piece of process equipment.

UNC Indicates that the equipment is uncontrolled. For example, a tank that is not equipped with a vapor recovery system, or an engine or heater that is not equipped with NOx controls are labeled UNC.

Loading Facility A crude oil loading rack or loading valve used for the transfer of crude oil from a storage tank or group of tanks to a delivery vessel.

BL A crude oil loading facility that is equipped with bottom loading capabilities.

SF A crude oil loading facility that is equipped with submerged fill loading capabilities.

NG Indicates that the equipment is permitted to be fired on natural gas only.

NG/FO Indicates that equipment is permitted to be fired on natural gas with fuel oil or diesel as a backup fuel.

BHP The output of an internal combustion engine as measured in brake horsepower.

MMBTU/Hr The heat input of an external combustion device as measured in millions of British Thermal Units per hour.

Sump Device used for separation, generally in constant use.

Pit Device used to receive emergency or intermittent flows.

Cover Indicates that a petroleum sump, pit, or pond is equipped with a properly installed and maintained cover which complies with Rule 71.4.

EXEMPT A tank, pit, or sump that processes produced water with an ROC content of less than 5 milligrams per liter and is exempt from Rule 71.1 or Rule 71.4.

Lo-NOx Device has equipment to control the emissions of NOx and CO to meet the requirements of Rules 74.15 or 74.15.1, or best available control technology requirements.

Rich Burn or Lean Burn A designation associated with a gas-fired internal combustion engine that determines its Rule 74.9 compliance requirements.

NSCR Engine that is equipped with non-selective catalytic reduction to meet its Rule 74.9 compliance requirements.

PSC Engine that is equipped with a pre-stratified charge to meet its Rule 74.9 compliance requirements.

SCR Engine or turbine that is equipped with selective catalytic reduction and ammonia injection to meet its Rule 74.9 or Rule 72.23 compliance requirements.

TITLE V APPLICABLE REQUIREMENT CODE KEY

Rule 70, "Storage and Transfer of Gasoline"

(District: 5/13/97 SIP: 5/4/95)

1. Storage tank shall be equipped with a submerged fill pipe only, tank is exempt from Phase I and Phase II vapor recovery since gasoline throughput has not exceeded 6,000 gallons per year. (70.B.1 and 70.F.3) Tank vent shall be equipped with a pressure vacuum relief valve. (70.B.6) Requirement for signage in dispensing area. (70.B.15)
2. Storage tank shall be equipped with a submerged fill pipe and Phase I vapor recovery, tank is exempt from Phase II vapor recovery since gasoline throughput has not exceeded 24,000 gallons per year (70.B.1, 70.B.2, and 70.F.4) Tank vent shall be equipped with a pressure vacuum relief valve. (70.B.6) Requirement for signage in dispensing area. (70.B.15)
3. Storage tank shall be equipped with a submerged fill pipe, Phase I vapor recovery, and Phase II vapor recovery. (70.B.1, 70.B.2, and 70.B.9) Tank vent shall be equipped with a pressure vacuum relief valve. (70.B.6) Requirement for signage in dispensing area. (70.B.15) Operation and maintenance requirements for Phase II vapor recovery components. (70.E)

Rule 71.1, "Crude Oil Production and Separation"

(District: 6/6/92 SIP: 6/6/92)

1. Storage tanks shall be equipped with a vapor recovery system that directs all vapors to a gas gathering system or flare (71.1.B.1.a)
2. Storage tanks shall be equipped with a vapor recovery system that directs all vapors to some other control system with a minimum destruction or removal efficiency of 90% by weight (71.1.B.1.b)
3. Tank batteries installed prior to June 20, 1978 are exempt from vapor recovery when processing crude oil having a modified Reid vapor pressure of less than 0.5 psia. Solid roof and pressure-vacuum relief valve is required. (71.1.B.2/71.1.D.1.a)
4. Storage tanks are exempt from the solid roof and vapor recovery requirements if the ROC content of the liquid entering the tank is less than 5 milligrams per liter. (71.1.D.3)
5. Storage tanks are exempt from the solid roof and vapor recovery requirements if a BACT Cost Analysis indicates that maximum emission reduction has already taken place. (71.1.D.4)
6. Portable tanks shall be equipped with closed covers and pressure vacuum valves and have limited exemptions from vapor recovery requirements. (71.1.B.3/71.1.D.1.c)

Rule 71.3, "Transfer of Reactive Organic Compound Liquids"

(District: 6/16/92 SIP: 6/16/92)

1. Requirement for submerged fill pipe or bottom loading and exemption from vapor recovery based on low throughput. (71.3.B.1) Requirement for leak-free equipment. (71.3.B.3)
2. Requirement for bottom loaded vapor recovery system which connects to a gas pipeline recovery and distribution system with automatic primary and secondary overfill protection. (71.3.B.2.a.1 and 71.3.B.2.b.1) Requirement for leak-free equipment. (71.3.B.3)
3. Requirement for bottom loaded vapor recovery system which connects to a 90% vapor disposal system with automatic primary and secondary overfill protection. (71.3.B.2.a.2 and 71.3.B.2.b.1) Requirement for leak-free equipment. (71.3.B.3)
4. Requirement for bottom loaded vapor recovery system which connects to a gas pipeline recovery and distribution system and APCO-approved alternative primary and secondary overfill protection. (71.3.B.2.a.1 and 71.3.B.2.b.2) Requirement for leak-free equipment. (71.3.B.3)
5. Requirement for bottom loaded vapor recovery system which connects to a 90% vapor disposal system and APCO-approved alternative primary and secondary overfill protection (71.3.B.2.a.2 and 71.3.B.2.b.2) Requirement for leak-free equipment. (71.3.B.3)
6. Exemption from Rule 71.3 because the crude oil has a modified Reid vapor pressure of less than 0.5 psia. (71.3.E.1)
7. Requirement for submerged fill pipe or bottom loading and exemption from vapor recovery when transfer is from a tank exempt from the vapor recovery requirements of Rule 71.1. (71.3.B.1 and 71.3.E.2) Requirement for leak-free equipment. (71.3.B.3)
8. Requirement for submerged fill pipe or bottom loading and exemption from vapor recovery when transfer is from a tank that is located more than 1200 feet from a loading facility constructed prior to July 1, 1990. (71.3.B.1 and 71.3.E.3) Requirement for leak-free equipment. (71.3.B.3)
9. Exemption from Rule 71.3 because the crude oil is being transferred into a vacuum truck, and not into a ROC liquid delivery vessel as defined in Rule 71.B.26. (71.B.26)

<u>Rule 71.4, "Petroleum Sumps, Pits, Ponds and Well Cellars"</u>

(District: 6/8/93 SIP: 6/8/93)

1. Second and third stage sumps, pits, and ponds shall have an impermeable cover (71.4.B.2)
2. Exemption from cover requirement for emergency pits (71.4.C.1.b)
3. Exemption from cover requirement for sumps, pits, or pond if the ROC content of the liquid at the point of entry is less than 5 milligrams per liter (71.4.C.1.c)
4. Exemption from cover requirement for sumps, pits, or pond when a BACT Cost Analysis indicates that maximum emission reduction has already taken place.

(71.4.C.1.d)

Rule 71.5, "Glycol Dehydrators"
(District: 12/13/94 SIP: 12/13/94)

1. Requirement to have a condenser or separator system which directs vapors to a fuel gas or sales gas system. (71.5.B.1.a.1) Requirement to prevent hydrocarbon liquid evaporation and control system leaks. (71.5.B.2 and 71.5.B.3)
2. Requirement to have a condenser or separator system which directs vapors to a flare, incinerator, thermal oxidizer or reboiler. (71.5.B.1.a.2) Operation requirements for flare or incinerator. (71.5.B.1.b) Requirement to prevent hydrocarbon liquid evaporation and control system leaks. (71.5.B.2 and 71.5.B.3)
3. Requirement to have a condenser or separator system which directs vapors to another 95% control system. (71.5.B.1.a.3) Requirement to prevent hydrocarbon liquid evaporation and control system leaks. (71.5.B.2 and 71.5.B.3)
4. Requirement to have any other control system with a 95% control efficiency or which meets an emission limit of 1.7 lb ROC per MMSCF of gas dehydrated. (71.5.B.1.c) Requirement to prevent hydrocarbon liquid evaporation and control system leaks. (71.5.B.2 and 71.5.B.3)
5. Exemption from the control requirements of Rule 71.5 for unit that is operated less than 200 hours per year. (71.5.C)

Rule 74.9, "Stationary Internal Combustion Engines"
(District: 12/21/93 SIP: 12/21/93)

1. Pre-January 1, 2002 emission limits and post-January 1, 2002 emission limits for natural gas rich burn engines with existing emission controls installed after September 5, 1989. (74.9.B.1 or 74.9.B.2, and 74.9.B.3)
2. Pre-January 1, 2002 emission limits and post-January 1, 2002 emission limits for natural gas lean burn engines with existing emission controls installed after September 5, 1989. (74.9.B.1 or 74.9.B.2, and 74.9.B.3)
3. Post-January 1, 1997 emission limits for natural gas rich burn engines with emission controls installed before September 5, 1989; or installed after March 5, 1992. (74.9.B.1 or 74.9.B.2)
4. Post-January 1, 1997 emission limits for natural gas lean burn engines with emission controls installed before September 5, 1989; or installed after March 5, 1992. (74.9.B.1 or 74.9.B.2) Post-January 1, 1997 emission limit for ammonia, if applicable. (74.9.B.5)
5. Post-January 1, 1997 emission limits for diesel engines. (74.9.B.1 or 74.9.B.2) Post-January 1, 1997 emission limit for ammonia, if applicable. (74.9.B.5)
6. Exemption from Rule 74.9 for engines operated less than 200 hours per calendar year (74.9.D.2)
7. Exemption from Rule 74.9 for emergency standby engines operated during either an emergency or maintenance operation. (74.9.D.3)

8. Exemption from Rule 74.9 for diesel engines with a permitted capacity factor of less than or equal to 15%. (74.9.D.8)
9. Exemption from Rule 74.9 for diesel engines used to power cranes and welding equipment. (74.9.D.9)

Rule 74.15, "Boilers, Steam Generators and Process Heaters"
(District: 11/8/94 SIP: 11/8/94)

1. NOx and CO emission limits for units with an annual heat input rate greater than or equal to 9,000 MMBTU per calendar year (74.15.B.1)
2. Tuning and fuel metering requirements for units with an annual heat input rate of less than 9,000 MMBTU per calendar year. (74.15.B.2 and 74.15.D.1)

Rule 74.15.1, "Boilers, Steam Generators and Process Heaters"
(District: 6/13/95 SIP: 5/11/93)

1. NOx and CO emission limits for units with an annual heat input greater than or equal to 1,800 MMBTU. (74.15.1.B.1)
2. Tuning and fuel metering requirements for units with an annual heat input rate of greater than or equal to 300 MMBTU and less than 1,800 MMBTU. (74.15.1.B.2 and 74.15.1.D.1)
3. Exemption from tuning requirements for units with an annual heat input rate less than 300 MMBTU and requirement for metering. (74.15.1.B.2 and 74.15.1.D.1)
4. Equipment is currently shut-down and not operating. Upon operation will install fuel meter (74.15.1.D.1). Based on annual heat input will perform tuning (74.15.1.B.2) or will comply with NOx and CO emission limits (74.15.1.B.1).

Rule 74.23, "Stationary Gas Turbines"
(District: 10/10/95 SIP: 10/10/95)

1. NOx and NH3 emission limit for turbines rated at 0.3 MW to less than 2.9 MW (74.23.B.1 and 74.23.B.4) Requirement to monitor operating parameters. (74.23.B.2.a and b)
2. NOx and NH3 emission limit for turbines rated at 2.9 MW to less than 10.0 MW. (74.23.B.1 and 74.23.B.4) Requirement to monitor operating parameters. (74.23.B.2.a and b)
3. NOx and NH3 emission limit for turbines rated at 10.0 MW and higher, with SCR, and operated less than 4,000 hr/yr (74.23.B.1 and 74.23.B.4) Requirement to monitor operating parameters. (74.23.B.2.a and b)
4. NOx and NH3 emission limit and CEMS requirement for turbines rated at 10.0 MW and higher, with SCR, and operated more than 4,000 hr/yr (74.23.B.1, 74.23.B.2, and 74.23.B.4)
5. NOx emission limit for turbines rated at 10.0 MW and higher, without SCR, and operated less than 4,000 hr/yr (74.23.B.1) Requirement to monitor operating parameters. (74.23.B.2.a and b)

6. NOx emission limit and CEMS requirement for turbines rated at 10.0 MW and higher, without SCR, and operated more than 4,000 hr/yr (74.23.B.1 and 74.23.B.2)
7. NOx emission limit for turbines rated at 4.0 MW and higher, operated less than 877 hr/yr (74.23.B.1) Requirement to monitor operating parameters. (74.23.B.2.a and b)
8. Exemption from the requirements of 74.23.B, for turbines operated less than 200 hrs per calendar year (74.23.C.1.c)
9. Exemption from the requirements of 74.23.B, for emergency standby units operated during either an emergency or maintenance operation. (74.23.C.1.d)
10. Pre-April 30, 2001 NOx emission limit and CEMS requirement and post-April 30, 2001 NOx emission limit and CEMS requirement for turbines rated at over 20 MW, equipped with water injection only where exhaust gases are used to dry paper, and operated more than 4,000 hr/yr (74.23.B.1, 74.23.B.2, 74.23.B.5, and 74.23.I.3)

3. PERMITTED THROUGHPUT AND CONSUMPTION LIMIT TABLE

Purpose

The purpose of this table is to list the emissions units at this stationary source that have limitations on throughput, fuel consumption, raw material usage, hours of operation, or other parameters that limit the potential to emit of the emissions unit. In some cases, the limit on the potential to emit is expressed directly as a set of pollutants and emission limits in tons per year.

These limitations are applied pursuant to Rule 26, “New Source Review” or Rule 29, "Conditions on Permits". Two sets of limits are listed in this table. The "Throughput Permit Limit" is the enforceable limit pursuant to this permit. Permit conditions that enforce these limits are listed in Section No. 8, “Permit Specific Conditions” of this permit.

The "Calculation Throughput" is used only to calculate permitted emissions pursuant to Rule 29, “Conditions on Permits”.

Equipment Description

This portion of the table is the same as the equipment description in the "Permitted Equipment and Applicable Requirements Table".

Throughput Permit Limit

The throughput or consumption limit listed in this column of the table is an enforceable limit on the emissions unit's potential to emit. In the column labeled "District (D)/ Federal (F) Enforceable", a "D" or an "F" denotes whether the limit is only enforceable by the District or whether the limit is a federally-enforceable limit. District-enforceable limits are limits applied solely pursuant to Rule 29, “Conditions on Permits”. Limits that have been applied pursuant to Rule 26, “New Source Review” are federally enforceable.

The throughput permit limit may apply to a single emissions unit or to a set of emission units. When the limit applies to set of emissions units, the set consists of the emissions unit with which the limit is listed and the emissions units which follow that have an asterisk in the throughput permit limit column.

Pursuant to Rule 26 and Rule 29, the throughput permit limit is an annual limit which is enforceable based on a period of any twelve (12) consecutive calendar months.

Note that when the calculation throughput (discussed below) corresponds to using the emissions unit full time (8760 hours per year) at maximum rated capacity, the throughput permit limit column contains the notation "No Limit". When District emission calculation procedures do not involve throughput or consumption data, both the throughput permit limit and the calculation throughput column are left blank.

Calculation Throughput

The throughput or consumption limit listed in this column of the table is the throughput used in the District calculation procedures to calculate permitted emissions for the emissions unit. The calculation throughput may apply to a single emissions unit or to a set of emissions units denoted as discussed above. The calculation throughput is not an enforceable permit limit.

The "Calculation Procedure" column is reserved for future use. Emission calculations for the emissions units in this table are available in the District's existing permit files for this stationary source.

Abbreviations

The following abbreviations have been used in the "Permitted Throughput and Consumption Limit Table" for the "Throughput Permit Limit" column and for the "Calculation Throughput Limit" column:

BBL/Yr: barrels per year
Days/Yr: days per year
FO: fuel oil or diesel fuel
Gal/Yr: gallons per year
Hrs/Day: hours per day
Hrs/Yr: hours per year
Lbs ROC/Yr: pounds of reactive organic compounds per year
MBBL/Yr: thousands of barrels per year
MGal/Yr: thousands of gallons per year
MMBTU/Yr: million British Thermal Units of heat input per year
MMCF/Yr: million standard cubic feet of natural gas per year
MMGal/Yr: million gallons per year
NG: natural gas
TPY: tons per year

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Permit to Operate No. 0012
Permitted Throughput/Consumption Limits

M:\TITLEV\LOTUS\TP_0012 29-Apr-98 Equipment	Permit Throughput Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput Limit	Calculation Procedure
Indirect Process Heat				
1 - 20.0 MMBTU/Hr NG/FO Erie City Boiler (7) Lo NOx	144.0 MMCF/Yr NG & 7.1 MGal/Yr FO	F	144 MMCF/Yr NG & 7.09 MGal/Yr FO	
	& 152,201.1 MMBTU/Yr Total Fuel			
1 - 4.0 MMBTU/Hr NG/FO Boiler (5) Standby UNC	76.6 MMCF/Yr NG & 13.8 Mgal/Yr FO	D	15.8 MMCF/Yr NG	
	& 82,320 MMBTU/Yr Total Fuel		& 10.3 MGal/Yr FO	
1 - 4.5 MMBTU/Hr NG/FO Boiler (6) Standby UNC	*	D	*	
1 - 3.0 MMBTU/Hr NG/FO Boiler (1) Standby UNC	*	D	*	
1 - 3.0 MMBTU/Hr NG/FO Boiler (4) Standby UNC	*	D	*	
1 - 3.15 MMBTU/Hr NG/FO Boiler Standby UNC(3500TF	*	D	*	
1 - 3.15 MMBTU/Hr NG/FO Boiler Standby UNC(3500TF	*	D	*	
1 - 3.15 MMBTU/Hr NG/FO Boiler Standby UNC(3500TF	*	D	*	
1 - 3.15 MMBTU/Hr NG/FO Boiler Standby UNC(3500TF	*	D	*	
Solids Recycling and Disposal System				
1 - 150 BBL Slop Tank (TC-14) VR	21.9 MBOPY	D	21.9 MBOPY	
1 - 500 BBL PWT (501) VR				
1 - 500 BBL PWT (502) VR				
Produced Gas Sweetening System				
1 (or More) - Nitrite Solution Vessels (No PE)				
Portable Steam Generators for Thermally EOR				
1 - 20.0 MMBTU/Hr NG Steam Generator (0) Lo NOx	163.3 MMCF/Yr NG & 0 MGal/Yr FO	F	163.3 MMCF/Yr NG	
1 - 20.0 MMBTU/Hr NG Steam Generator (1) Lo NOx	163.3 MMCF/Yr NG & 0	F	163.3 MMCF/Yr NG	

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
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Permitted Throughput/Consumption Limits

M:\TITLEV\LOTUS\TP_0012 29-Apr-98 Equipment	Permit Throughput Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput Limit	Calculation Procedure
	MGal/Yr FO			
1 - 20.0 MMBTU/Hr NG Steam Generator (2) Lo NOx	163.3 MMCF/Yr NG & 0 MGal/Yr FO	F	163.3 MMCF/Yr NG	
1 - 20.0 MMBTU/Hr NG/FO Steam Gen. (3) Lo NOx	163.3 MMCF/Yr NG & 5.91 MGal/Yr FO	F	163.3 MMCF/Yr NG & 5.91MGal/Yr FO	
1 - 20.0 MMBTU/Hr NG/FO Steam Gen. (4) Lo NOx	163.3 MMCF/Yr NG & 5.91 MGal/Yr FO	F	163.3 MMCF/Yr NG & 11.82 MGal/Yr FO	
1 - 20.0 MMBTU/Hr NG/FO Steam Gen. (5) LoNox	163.3 MMCF/Yr NG & 5.91 MGal/Yr FO	F	163.3 MMCF/Yr NG & * (for FO)	
Production Tank System				
1 - 2000 BBL COST (2001) VR	2,241.0 MBBL/Yr	D	547.0 MBBL/Yr	
1 - 2000 BBL COST (2002) VR	*	D	547.0 MBBL/Yr	
1 - 2000 BBL COST (2003) VR	*	D	143.4 MBBL/Yr	
1 - 2000 BBL COST (2004) VR	*	D	143.4 MBBL/Yr	
1 - 2000 BBL COST (2005) VR	*	D	143.4 MBBL/Yr	
1 - 2000 BBL COST (2006) VR	*	D	143.4 MBBL/Yr	
1 - 2000 BBL COST (2008) VR	*	D	143.4 MBBL/Yr	
1 - 2000 BBL COST (2009) VR	*	D	143.4 MBBL/Yr	
1 - 2000 BBL COST (2011) VR	*	D	143.4 MBBL/Yr	
1 - 2000 BBL COST (2012) VR	*	D	143.4 MBBL/Yr	
1 - 2500 BBL COST (C-1) VR (Transamerica Lease)	136.3 MBBL/Yr	D	136.3 MBBL/Yr	
1 - 2000 BBL COST (C-2) VR (Transamerica Lease@Texcon)	356.0 MBBL/Yr	D	178.0 MBBL/Yr	
1 - 2000 BBL COST (C-3) VR (Transamerica Lease@Texcon)	*	D	178.0 MBBL/Yr	
1 - 30000 BBL COST (30001) VR	110.0 MBBL/Yr	D	110.0 MBBL/Yr	
1 - 2500 BBL PWT (2501) VR				
1 - Crude Oil Loading Rack BL VR (Transamerica@C-1 Tank)	191.4 MBBL/Yr	D	191.4 MBBL/Yr	
1 - Crude Oil Loading Rack BL VR (Texcon@C-2,C-1	227.9 MBBL/Yr	D	227.9 MBB;L/Yr	

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
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Permitted Throughput/Consumption Limits

M:\TITLEV\LOTUS\TP_0012 29-Apr-98 Equipment	Permit Throughput Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput Limit	Calculation Procedure
Tanks)				
1 - Crude Oil Loading Rack BL VR (2005-2006 Tank Area)	529.2 MBBL/Yr	D	529.2 MBBL/Yr	
Process Heater Prior to Separation Tower				
1 - 20.0 MMBTU/Hr NG/FONatco	136.1 MMCF/Yr NG & 7.1 MGal/Yr FO	F	136.1 MMCF/Yr NG and 7.09 MGal/Yr FO	
Crude Oil Process Heater Lo NOx	& 143,801.1 MMBTU/Yr Total Fuel			
Gas Oil (Diluent) Storage & Injection System				
Tenby Inc. Main Facility				
1 - Gas Oil Loading Rack BL VR (1501 -1503 Tank Area)	127.3 MBBL/Yr	D	127.3 MBBL/Yr	
1 - 1500 BBL Gas Oil Storage Tank (1501) VR	476.4 MBBL/Yr	D	115.0 MBBL/Yr	
1 - 1500 BBL Gas Oil Storage Tank (1502) VR	*	D	91.4 MBBL/Yr	
1 - 1500 BBL Gas Oil Storage Tank (1503) VR	*	D	70.0 MBBL/Yr	
1 - 700 BBL Gas Oil Storage Tank (701) VR	*	D	100.0 MBBL/Yr	
1 - 700 BBL Gas Oil Storage Tank (702) VR	*	D	100.0 MBBL/Yr	
3500 Tank Farm				
1 - 3500 BBL Gas Oil Storage Tank (3500) VR	226.0 MBBL/Yr	F	20.0 MBBL/Yr	
1 - 3000 BBL Gas Oil Storage Tank (3001) VR	*	F	20.0 MBBL/Yr	
1 - 3000 BBL Gas Oil Storage Tank (3003) VR	*	F	20.0 MBBL/Yr	
1 - 1500 BBL Gas Oil Storage Tank (1506) VR	*	F	146.0 MBBL/Yr	
1 - 1500 BBL Gas Oil Storage Tank (1507) VR	*	F	10.0 MBBL/Yr	
1 - 1000 BBL Gas Oil Storage Tank (1505) VR	*	F	5.0 MBBL/Yr	
1 - 2000 BBL Gas Oil Storage Tank (2000) VR	*	F	5.0 MBBL/Yr	
1 - Gas Oil Loading Rack BL VR	9.152 Mgal/Yr	D	9.152 Mgal/Yr	
Asphalt Tank Heating and Storage				

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
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Permitted Throughput/Consumption Limits

M:\TITLEV\LOTUS\TP_0012 29-Apr-98 Equipment	Permit Throughput Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput Limit	Calculation Procedure
1 - 4.9 MMBTU/Hr Asphalt Heater (Tank 12001) Lo NOx	**	D	60.8 MMCF/Yr NG and 3.5MGal/Yr FO	
1 - 4.9 MMBTU/Hr Asphalt Heater (P-1) Lo NOx	**	D	*	
1 - 1.0 MMBTU/Hr Asphalt Heater (506) UNC (stndby)	**	D	***	
1 - 1.0 MMBTU/Hr Asphalt Heater (Shell 1 & 2) UNC (stndby)	**	D	***	
1 - 12000 BBL Asphalt Storage Tank (12001) VR	1,034.9 MBBL/Yr	D	300.0 MBBL/Yr	
1 - 2000 BBL Asphalt Storage Tank (2007) VR	*	D	150.0 MBBL/Yr	
1 - 2000 BBL Asphalt Storage Tank (2010) VR	*	D	150.0 MBBL/Yr	
1 - 800 BBL Asphalt Storage Tank (1001) VR	*	D	10.0 MBBL/Yr	
1 - 1000 BBL Asphalt Storage Tank (1002) VR	*	D	50.0 MBBL/Yr	
1 - 1000 BBL Asphalt Storage Tank (1003) VR	*	D	30.0 MBBL/Yr	
1 - 1000 BBL Asphalt Storage Tank (1004) VR	*	D	30.0 MBBL/Yr	
1 - 500 BBL Asphalt Storage Tank (505) VR	*	D	0.0 MBBL/Yr	
1 - 500 BBL Asphalt Storage Tank (506) VR	*	D	0.0 MBBL/Yr	
1 - 600 BBL Asphalt Storage Tank (Shell 1 & 2) VR	*	D	21.9 MBBL/Yr	
1 - 3500 BBL Asphalt Storage Tank (3501) VR	*	D	293.0 MBBL/Yr	
1 - Asphalt Loading Rack SF VR (Shell Tanks)	17,178.0 MGal/Yr	D	17,178 MGal/Yr	
1 - Asphalt Loading Rack SF VR (12001 Tank Farm)	*	D	*	
1 - Asphalt Loading Rack SF VR (12001 Tank Farm)	*	D	*	
1 - Asphalt Loading Rack SF VR (@ 1002 Tank)	*	D	*	
1 - Asphalt Loading Rack SF VR (@ 3501 Tank)	*	D	*	
For Use Throughout Leases				
86 - Oil Wells				

* - Included in Limit Above

** - Included in Permit Throughput Limit Above for Stby Boiler (5)

*** - Included in Calculation Throughput Limit

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
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Permitted Throughput/Consumption Limits

M:\TITLEV\LOTUS\TP_0012 29-Apr-98 Equipment	Permit Throughput Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput Limit	Calculation Procedure
for Stby Boiler (5) Note that the MMBtu/Yr Numbers were Calculated Based On Heating Values of 1050 Btu/Scf for NG, and 141,000 Btu/Gal for FO				

4. PERMITTED EMISSIONS TABLE

Purpose

The purpose of this table is to document the permitted emissions for this stationary source. Rule 29, “Conditions on Permits”, requires permitted emissions to be included on each Permit to Operate. Rule 29 is not federally enforceable.

The permitted emissions table also characterizes the amount and type of criteria air pollutants emitted by this stationary source.

Rule 29 requires that annual permitted emissions be based on a 12 calendar month rolling period and be expressed in units of tons per year. Hourly permitted emissions are required to be expressed in units of pounds per hour. Permitted emissions for a stationary source are required to be determined by aggregating the permitted emissions for each emissions unit at the stationary source.

Enforceability of Permitted Emissions

The permitted emissions in the units of tons per year and pounds per hour listed in the permitted emissions table are not directly enforceable as permit conditions. Other permit conditions listed in the permit, however, are designed to limit the emissions from this stationary source to the limits in the table.

In general, permitted emissions are calculated based on throughput or consumption data for an emission unit, specific physical characteristics of the emission unit, and emission factors. The emission factors may be standard published emission factors or they may be derived from source test data or specific emission limits that apply to the emissions unit. In some cases, permitted emissions are expressed directly as a set of pollutants and emission limits in tons per year without reference to any calculation method.

Section No. 3, “Permitted Throughput and Consumption Limit Table”, contains information on the throughput and consumption limits that are enforceable at this stationary source. In addition, other sections of this permit contain conditions that act to enforce specific portions of the permitted emissions table.

Equipment Description

This portion of the table is the same as the equipment description in the "Permitted Equipment and Applicable Requirements Table".

This column of the table represents the permitted emissions in units of tons per year for ROC (reactive organic compounds), NOx (nitrogen oxides), PM (particulate matter), SOx (sulfur oxides), and CO (carbon monoxide). In some cases, emissions of non-criteria pollutants of interest may also be listed. Pursuant to Rule 29, annual permitted emissions shall be the annual emissions used to determine compliance for issuance of any new or revised permit issued after October 22, 1991. For emissions units for which no new or revised permit has been issued since October 22, 1991, annual permitted emissions generally reflect actual historical emissions from the emissions unit.

The permitted emissions limit may apply to a single emissions unit or to a set of emission units. When the limit applies to set of emissions units, the set consists of the emissions unit with which the limit is listed and the emissions units which follow that have an asterisk in the pollutant columns.

Pounds Per Hour

This column of the table represents the permitted emissions in units of pounds per hour for ROC (reactive organic compounds), NOx (nitrogen oxides), PM (particulate matter), SOx (sulfur oxides), and CO (carbon monoxide). Pursuant to Rule 29, hourly permitted emissions shall be calculated based on the maximum quantity of each air pollutant which may be emitted from the emissions unit during a one hour period, as limited by any applicable rules or permit conditions.

Hazardous Air Pollutants

This permit does not provide information that characterizes the emissions of hazardous air pollutants (HAPS) from this facility. This information can be obtained from the facility's AB-2588, Air Toxics "Hot Spots", Report referenced at the bottom of the “Permitted Emissions Table”. For Outer Continental Source (OCS) sources, not subject to AB-2588, HAP emissions information is referenced in the permit application and is maintained by the stationary source.

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Permit to Operate No. 0012
Permitted Emissions

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Equipment	TONS PER YEAR					POUNDS PER HOUR				
	ROC	NOx	PM	SOx	CO	ROC	NOx	PM	SOx	CO
Indirect Process Heat										
1 - 20.0 MMBTU/Hr NG/FO Erie City Boiler (7) Lo NOx	0.20	3.33	0.22	2.90	7.34	0.05	2.84	0.28	10.21	1.93
1 - 4.0 MMBTU/Hr NG/FO Boiler (5) Standby UNC	0.04	0.89	0.03	0.32	0.18	0.15	4.13	0.41	14.86	1.03
1 - 4.5 MMBTU/Hr NG/FO Boiler (6) Standby UNC	**	**	**	**	**	**	**	**	**	**
1 - 3.0 MMBTU/Hr NG/FO Boiler (1) Standby UNC	**	**	**	**	**	**	**	**	**	**
1 - 3.0 MMBTU/Hr NG/FO Boiler (4) Standby UNC	**	**	**	**	**	**	**	**	**	**
1 - 3.15 MMBTU/Hr NG/FO Boiler Standby UNC(3500TF)	**	**	**	**	**	**	**	**	**	**
1 - 3.15 MMBTU/Hr NG/FO Boiler Standby UNC(3500TF)	**	**	**	**	**	**	**	**	**	**
1 - 3.15 MMBTU/Hr NG/FO Boiler Standby UNC(3500TF)	**	**	**	**	**	**	**	**	**	**
1 - 3.15 MMBTU/Hr NG/FO Boiler Standby UNC(3500TF)	**	**	**	**	**	**	**	**	**	**
Solids Recycling and Disposal System										
1 - 150 BBL Slop Tank (TC-14) VR	0.02					0.01				
1 - 500 BBL PWT (501) VR	0.01					0.00				
1 - 500 BBL PWT (502) VR	0.02					0.00				
Produced Gas Sweetening System										
1 (or More) - Nitrite Solution Vessels (No PE)										
Portable Steam Generators for Thermally EOR										
1 - 20.0 MMBTU/Hr NG Steam Generator (0) Lo NOx	0.23	4.08	0.24	3.29	6.84	0.05	0.95	0.06	7.66	1.25
1 - 20.0 MMBTU/Hr NG Steam Generator (1) Lo NOx	4.53	4.08	0.24	3.29	4.59	1.05	0.95	0.06	7.66	1.07
1 - 20.0 MMBTU/Hr NG Steam Generator (2) Lo NOx	0.23	4.08	0.24	3.29	3.69	0.05	0.95	0.06	7.66	0.67
1 - 20.0 MMBTU/Hr NG/FO Steam Gen. (3) Lo NOx	1.79	4.08	0.24	3.29	8.24	0.41	+	+	7.66	1.45
Fuel Oil (3)	0.00	0.08	0.01	0.11	0.01	+	3.14	0.24	+	+

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Permit to Operate No. 0012
Permitted Emissions

M:\TITLEV\LOTUS\PE_0012 29-Apr-98	TONS PER YEAR					POUNDS PER HOUR				
Equipment	ROC	NOx	PM	SOx	CO	ROC	NOx	PM	SOx	CO
1 - 20.0 MMBTU/Hr NG/FO Steam Gen. (4) Lo NOx	0.23	4.08	0.24	3.29	2.86	0.05	+	+	7.66	0.67
1 - 20.0 MMBTU/Hr NG/FO Steam Gen. (5) LoNox	0.23	4.08	0.24	3.29	2.86	0.05	+	+	7.66	0.67
Fuel Oil (4 & 5)	0.00	0.19	0.01	0.21	0.03	+	7.47	0.47	+	+
Production Tank System										
1 - 2000 BBL COST (2001) VR	0.85					0.19				
1 - 2000 BBL COST (2002) VR	*					*				
1 - 2000 BBL COST (2003) VR	1.21					0.28				
1 - 2000 BBL COST (2004) VR	*					*				
1 - 2000 BBL COST (2005) VR	1.29					0.29				
1 - 2000 BBL COST (2006) VR	*					*				
1 - 2000 BBL COST (2008) VR	3.93					0.90				
1 - 2000 BBL COST (2009) VR	*					*				
1 - 2000 BBL COST (2011) VR	*					*				
1 - 2000 BBL COST (2012) VR	*					*				
1 - 2500 BBL COST (C-1) VR (Transamerica Lease)	0.29					0.07				
1 - 2000 BBL COST (C-2) VR (TransamericaLease@Texcon)	0.53					0.12				
1 - 2000 BBL COST (C-3) VR (TransamericaLease@Texcon)	*					*				
1 - 30000 BBL COST (30001) VR	0.60					0.14				
1 - 2500 BBL PWT (2501) VR	0.05					0.01				
1 - Crude Oil Loading Rack BL VR (Transamerica@C-1 Tank)	1.10					2.59				
1 - Crude Oil Loading Rack BL VR (Texcon@C-2,C-3 Tanks)	1.31					2.59				
1 - Crude Oil Loading Rack BL VR (2005-2006 Tank Area)	0.45					1.01				
Process Heater Prior to Separation Tower										
1 - 20.0 MMBTU/Hr NG/FONatco	0.19	2.96	0.21	2.74	2.40	0.05	2.84	0.28	10.21	0.71
Crude Oil Process Heater Lo NOx										

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Permit to Operate No. 0012
Permitted Emissions

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29-Apr-98

Equipment	TONS PER YEAR					POUNDS PER HOUR				
	ROC	NOx	PM	SOx	CO	ROC	NOx	PM	SOx	CO
Gas Oil (Diluent) Storage & Injection System										
Tenby Inc. Main Facility										
1 - Gas Oil Loading Rack BL VR (1501 -1503 Tank Area)	1.10					4.33				
1 - 1500 BBL Gas Oil Storage Tank (1501) VR	0.38					0.09				
1 - 1500 BBL Gas Oil Storage Tank (1502) VR	0.36					0.08				
1 - 1500 BBL Gas Oil Storage Tank (1503) VR	0.34					0.08				
1 - 700 BBL Gas Oil Storage Tank (701) VR	0.42					0.10				
1 - 700 BBL Gas Oil Storage Tank (702) VR	*					*				
3500 Tank Farm										
1 - 3500 BBL Gas Oil Storage Tank (3500) VR	0.23					0.05				
1 - 3000 BBL Gas Oil Storage Tank (3001) VR	0.42					0.10				
1 - 3000 BBL Gas Oil Storage Tank (3003) VR	*					*				
1 - 1500 BBL Gas Oil Storage Tank (1506) VR	0.40					0.09				
1 - 1500 BBL Gas Oil Storage Tank (1507) VR	0.10					0.02				
1 - 1000 BBL Gas Oil Storage Tank (1505) VR	0.08					0.02				
1 - 2000 BBL Gas Oil Storage Tank (2000) VR	0.11					0.03				
1 - Gas Oil Loading Rack BL VR	1.30					2.28				
Asphalt Tank Heating and Storage										
1 - 4.9 MMBTU/Hr Asphalt Heater (Tank 12001) Lo NOx	0.16	1.18	0.09	4.08	0.62	0.05	1.39	0.14	5.00	0.35
1 - 4.9 MMBTU/Hr Asphalt Heater (P-1) Lo NOx	*	*	*	*	*	*	*	*	*	*
1.0 MMBTU/Hr Asphalt Heater (506) UNC (stndby)	**	**	**	**	**	**	**	**	**	**
1.0 MMBTU/Hr Asphalt Heater (Shell 1 & 2) UNC (stndby)	**	**	**	**	**	**	**	**	**	**
1 - 12000 BBL Asphalt Storage Tank (12001) VR	0.29					0.07				
1 - 2000 BBL Asphalt Storage Tank (2007) VR	0.08					0.02				
1 - 2000 BBL Asphalt Storage Tank (2010) VR	0.08					0.02				
1 - 800 BBL Asphalt Storage Tank (1001) VR	0.03					0.01				
1 - 1000 BBL Asphalt Storage Tank (1002) VR	0.04					0.01				

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
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Permitted Emissions

M:\TITLEV\LOTUS\PE_0012 29-Apr-98	TONS PER YEAR					POUNDS PER HOUR				
Equipment	ROC	NOx	PM	SOx	CO	ROC	NOx	PM	SOx	CO
1 - 1000 BBL Asphalt Storage Tank (1003) VR	0.06					0.01				
1 - 1000 BBL Asphalt Storage Tank (1004) VR	*					*				
1 - 500 BBL Asphalt Storage Tank (505) VR	0.02					0.00				
1 - 500 BBL Asphalt Storage Tank (506) VR	0.01					0.00				
1 - 600 BBL Asphalt Storage Tank (Shell 1 & 2) VR	0.03					0.01				
1 - 3500 BBL Asphalt Storage Tank (3501) VR	0.10					0.02				
1 - Asphalt Loading Rack SF VR (Shell Tanks)	0.23					0.49				
1 - Asphalt Loading Rack VR (12001 Tank Farm)	*					*				
1 - Asphalt Loading Rack SF VR (12001 Tank Farm)	*					*				
1 - Asphalt Loading Rack SF VR (@ 1002 Tank)	*					*				
1 - Asphalt Loading Rack SF VR (@ 3501 Tank)	*					*				
For Use Throughout Leases										
86 - Oil Wells	31.39					7.17				
* - Included in Emissions Above ** - Boiler (5) Includes All Standby Boilers and Heaters + - Worst Case Used NG vs. FO										
Total Permitted Emissions	57.09	33.11	2.01	30.10	39.66	25.26	24.66	2.00	86.24	9.80

HAP Emissions Ref.: AB 2588 Air Toxics Report Reporting Year: 1994 Submittal Date: July 1996

5. OIL WELL LIST

This permit authorizes the operation of a maximum number of wells for the production of oil or natural gas. This section of the permit contains a list of the wells currently authorized to be operated. When changes to the list are made, the permit holder is required to maintain a copy of the revised oil well list at the facility and to submit a copy of the revised oil well list to the District.

A revision to this permit is required prior to adding a well that is newly drilled to the oil well list or prior to increasing the number of wells on the oil well list. Other revisions to the oil well list will not require a revision to this permit.

Section No. 8, “Permit Specific Conditions”, includes a condition that limits the maximum number of producing wells at this stationary source. If applicable, Section No. 8 also includes a condition that requires best available control technology (BACT) on specific wells that were subject to Rule 26, “New Source Review”.

Ventura County Air Pollution Control District

OIL WELL LIST

Permit to Operate No. 0012

The following oil wells are on permit with Tenby Inc. Oxnard Field:

Philtom Lease Wells

Janet Culberson 2

Chase Lease Wells

El-Rio 1	Chase 5	Chase 21
El-Rio 1XA	Chase 6	Chase 22
El-Rio 2	Chase 7	Chase 23
El-Rio 3	Chase 8	Chase 24
El-Rio 4	Chase 9	Chase 25
El-Rio 5	Chase 10	Chase 26
El-Rio 6	Chase 11	Chase 27
El-Rio 7	Chase 12	Chase 28
El-Rio 8	Chase 13	Chase 29
El-Rio 9	Chase 14	Chase 30
Chase 1	Chase 15	Chase 31
Chase 2	Chase 16	Chase 32
Chase 2X	Chase 17	Chase 33
Chase 3	Chase 18	Chase 34
Chase 4	Chase 19	Chase 35
Chase 4X	Chase 20	Todd 2
		Todd 3

Transamerica Lease Wells

Hi-Ko	Texcon 213	Texcon 708
Texcon 1	Texcon 214	Texcon 709
Texcon 203	Texcon 215	Texcon 710
Texcon 204	Texcon 216	Texcon 711
Texcon 205	Texcon 217	Texcon 713
Texcon 206	Texcon 218	Texcon 714
Texcon 207	Texcon 219	Texcon 715
Texcon 208	Texcon 702	Texcon 716
Texcon 209	Texcon 704	Texcon 717
Texcon 210	Texcon 705	Texcon 718

Texcon 211
Texcon 212

Texcon 706
Texcon 707

Texcon 719

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6. EXEMPT EQUIPMENT LIST

Under the District's Title V Federal Operating Permit Program, insignificant activities have been defined to be equivalent to the operations, equipment, or emissions units that are exempt from permit as detailed in APCD Rule 23, "Exemptions From Permit". APCD Rule 33.2.A.11 (Part 70 Permits - Application Contents) requires the applicant to provide a list of all emissions units located at the stationary source that are exempt pursuant to APCD Rule 23 based on size or production rate.

This section of the permit contains a table entitled "Insignificant Activities (Exempt Equipment)". This table is a list of insignificant activities (exempt equipment) at the facility that are exempt from permit based on a size or production rate exemption in VCAPCD Rule 23, "Exemptions From Permit".

This table is presented for informational purposes only. Any changes to this list are not considered to be permit modifications, nor is the list considered to be enforceable. As detailed in APCD Rule 33.2.A.11, this list is required to be submitted with an application for permit reissuance. The general requirements listed in Section No. 9 of this permit may apply to these insignificant activities.

Ventura County Air Pollution Control District

INSIGNIFICANT ACTIVITIES (EXEMPT EQUIPMENT)

Form TVAF50/05-23-96

List all insignificant activities (exempt equipment) which are exempted because of size or production rate.

INSIGNIFICANT ACTIVITIES (EXEMPT EMISSION UNITS)	BASIS FOR EXEMPTION (Size/Production Rate)	RULE 23 CITATION
Ajax Boiler @ Texcon	< 1 MMBTU/Hr	23.C.1
120 HP Diesel Emergency Supply Fire Water Pump	Engine used for emergency pumping of water for fire protection, and engine maintenance operation is < 50 hr/yr	23.D.7
180 HP Diesel Fire Water Pump	Engine used for emergency pumping of water for fire protection, and engine maintenance operation is < 50 hr/yr	23.D.7
130 HP Gasoline Fire Water Pump	Engine used for emergency pumping of water for fire protection, and engine maintenance operation is < 50 hr/yr	23.D.7
343 HP Diesel Standby Emergency Generator	Engine used only when electrical power line fails, and engine maintenance operation is < 50 hr/yr	23.D.7

7. SPECIFIC APPLICABLE REQUIREMENTS (ATTACHMENTS)

As discussed in Section No. 2, “Permitted Equipment and Applicable Requirements Table”, the emissions units at this stationary source listed in the table have requirements that are specifically applicable to them. The applicable requirements are based on the District's prohibitory rules, federal NSPS (40 CFR Part 60), federal NESHAPS (40 CFR Part 61), and federal NESHAPS/MACT (40 CFR Part 63).

In this section of the permit, the permit conditions that are associated with each specific applicable requirement are listed in an individual attachment. The attachment is identified with the label “Attachment (APCD Rule No. or CFR No.) #” in the lower left corner. Each attachment has an applicability section that describes how and why this attachment applies to the specific emissions unit. The attachment may apply to one or more of the emissions units listed in the Permitted Equipment and Applicable Requirements Table in Section No. 2.

Ventura County Air Pollution Control District
Rule 71.1.B.1.a Applicable Requirements
Tanks Equipped with Vapor Recovery

Rule 71.1, "Crude Oil Production and Separation"
Adopted 6/16/92, Federally-Enforceable

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"
Adopted 6/16/92, Federally-Enforceable

Applicability:

This attachment applies to tanks at this stationary source equipped with a vapor recovery system which directs all vapors to a fuel gas system, a sales gas system, or to a flare. Specifically, this attachment applies to all storage tanks in a tank battery including wash tanks, produced water tanks, and wastewater separators, that are used in the production, gathering, storage, processing, and separation of crude oil and natural gas from any petroleum production permit unit prior to custody transfer. This attachment does not apply to portable tanks or other tanks not equipped with vapor recovery.

A tank is defined as a container, constructed primarily of nonearthen materials, used for the purpose of storing or holding petroleum material, or for the purpose of separating water and/or gas from petroleum material. A tank battery is defined as any tank or aggregation of tanks. An aggregation of tanks is considered a tank battery only if the tanks are located so that no one tank is more than 150 feet from any other tank, edge to edge.

The tank's hatches and other inlet and outlet liquid and gas piping connections are considered to be components subject to the leak requirements of APCD Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".

Conditions:

1. Pursuant to Rule 71.1.B.1.a, all tanks shall be equipped with a properly installed, maintained and operated vapor recovery system. The vapor disposal portion of the vapor recovery system shall consist of either a system which directs all vapors to a fuel gas system, a sales gas system, or to a flare that combusts reactive organic compounds.

2. Pursuant to Rule 71.1.D.2, the vapor recovery provisions of Rule 71.1.B.1.a shall not apply during maintenance operations on vapor recovery systems or tank batteries, including wash tanks, produced water tanks and wastewater separators, if the Air Pollution Control District is notified verbally at least 24 hours prior to the maintenance operation and if the maintenance operation will take no more than 24 hours to complete.

3. The tank's hatches and other inlet and outlet gas and liquid piping connections are components subject to the leak requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".

4. On a quarterly basis, permittee shall monitor the storage tank vapor recovery system to ensure that compliance with Rule 71.1.B.1.a is being maintained. This shall include an inspection of the following components, as applicable, for proper operation: gas compressor, hatches, relief valves, pressure regulators, flare. Permittee shall keep dated records of the quarterly inspections and tank maintenance activities. These records shall be maintained at the facility and submitted to the District upon request.

5. On an annual basis, permittee shall certify that storage tanks at the facility are complying with Rule 71.1.B.1.a. This annual compliance certification shall include verifying that the tanks are equipped with a vapor recovery system.

Ventura County Air Pollution Control District
Rules 71.3.B.2.a.1 and 71.3.B.2.b.2 Applicable Requirements
ROC Liquid Loading Facilities
Bottom Loaded Vapor Recovery System To Gas Pipeline
District-Approved Alternative
Primary and Secondary Overfill Protection

Rule 71.3, "Transfer of Reactive Organic Compound Liquids"
Adopted 6/16/92, Federally-Enforceable

Applicability:

This attachment applies to equipment used to transfer reactive organic compound (ROC) liquids with a Modified Reid Vapor Pressure (MRVP) greater than or equal to 0.5 psia. This attachment does not apply to the transfer of gasoline, or to the transfer of ROC liquids via pipeline.

Specifically, this attachment applies to loading facilities that are equipped with a bottom-loaded vapor recovery system that connects to a gas pipeline recovery and distribution system and are equipped with a District-approved alternative primary and secondary overfill protection system.

A loading facility is defined as any aggregation or combination of organic liquid loading equipment which is located so that all the organic liquid loading outlets for such aggregation or combination of loading equipment can be encompassed within any circle of 300 feet in diameter.

Conditions:

1. Pursuant to Rule 71.3.B.2.a.1, no person shall transfer ROC liquids into any ROC liquid delivery vessel without utilizing a bottom-loaded vapor recovery system that prevents the displaced vapors during loading from being released into the atmosphere. The vapor recovery system shall be capable of collecting all ROC vapors, and shall have a vapor return or condensation system that connects to a gas pipeline recovery and distribution system.

2. Pursuant to Rule 71.3.B.2.b.2, no person shall transfer ROC liquids into any ROC liquid delivery vessel without utilizing a combination of overfill devices and/or procedures, submitted in writing to the APCO, that is at least as effective in preventing overfill spillage as the system in Rule 71.3.B.2.b.1. Permittee has

submitted an alternative primary and secondary overfill protection system and shall comply with Rule 71.3.B.2.b in the following manner:

In order to meet primary overfill protection requirements, the applicable loading racks shall be equipped with meters that automatically shut off when the preset volume in gallons is loaded. This preset gallon amount is based on the maximum weight of ROC liquid that can be legally loaded into the delivery vessel. The maximum weight of liquid that can be loaded shall be determined by first weighing the delivery vessel prior to loading, then subtracting its weight from the total legal weight limit, and then dividing the maximum weight by the liquid density (weight per gallon) to get this amount in gallons.

In order to meet secondary overfill protection requirements, the operator shall set the meter initially to a volume in gallons less than that which would indicate a maximum load, and then the operator shall visually check the truck tank level after the meter shuts off the liquid transfer process. The driver shall then determine how much more liquid, if any, can be loaded. The preset fill meter shall also be used for any additional liquid loading.

As an additional precaution, the maximum weight of liquid that can be legally loaded in the delivery vessel shall still allow for additional volume to load more liquid before an overfill condition would occur. This additional volume can equate up to 3500 gallons or more, depending on the type of liquid and delivery vessel being loaded.

3. Pursuant to Rule 71.3.B.2.c, no person shall transfer ROC liquids into any ROC liquid delivery vessel without utilizing either a block and bleed valve system or other connectors with equivalent spill prevention characteristics.

4. Pursuant to Rule 71.3.B.3, any loading operation equipment, vapor recovery system, or other equipment required by Rule 71.3 shall not leak. The vapor recovery system shall be operated and maintained so that it does not cause the pressure in any delivery vessel to exceed 18 inches water gauge or the vacuum to exceed 6 inches water gauge.

5. Pursuant to Rule 71.3.C.1, no person shall transfer ROC liquids into a delivery vessel using loading equipment having a vapor recovery system unless the delivery vessel is leak free and is permanently equipped with:

a. A properly installed vapor recovery system that is compatible with the loading facility.

b. A pressure-vacuum relief device for each compartment that is set at 90 percent of the maximum, safe pressure and vacuum ratings of the vessel.

c. A secondary overfill protection system compatible with the loading operation APCO-approved secondary overfill protection system.

d. A loading connector/adapter that is compatible with those required at the loading facility.

6. Pursuant to Rule 71.3.C.2, no person shall fill an ROC liquid delivery vessel unless the vapor recovery system is properly operating, properly maintained, does not leak, and all hatches are closed during transfer operations.

7. Permittee shall perform routine surveillance of the applicable loading facility during loading operations to ensure that compliance with the above requirements of Rule 71.3 is being maintained. This routine surveillance shall include assuring proper operation of the vapor recovery and overfill protection systems, that the equipment is leak free, and that compliant delivery vessels are being utilized.

   Pursuant to Rule 71.3.D.1, permittee shall annually monitor one complete loading operation for leaks and for proper operation of the loading equipment and delivery vessel vapor recovery and overfill protection systems. In order to detect leaks during the annual operator inspection, the permittee shall utilize an appropriate analyzer calibrated with methane or the alternative screening procedure in EPA Reference Method 21, as detailed in Rule 71.3.G.3.

8. Pursuant to Rule 71.3.D.2, permittee shall notify the District Enforcement Section of the following problems no later than 72 hours after the annual inspection required by Rule 71.3.D.1:

   a. If any leaks were detected,
   b. If the vapor recovery system, including any flare or incinerator, was not operating properly,
   c. If any hatches were opened during the filling operation,
   d. If the overfill prevention systems malfunctioned, or
   e. If any spillage of ROC liquid occurred.

9. Pursuant to Rule 71.3.D.3, any leak detected shall be repaired to a leak free state and any vapor recovery system or overfill prevention system found malfunctioning

shall be restored to a properly operating condition. These repairs shall be done as soon as practicable but no later than 5 calendar days from the detection date.

10. Pursuant to Rule 71.3.F.1, the operator of any loading equipment equipped with a bottom-loaded vapor recovery system shall maintain a record of the inspection required by Rule 71.3.D.1 and submit this record to the District upon request. These records shall, at a minimum, include the following:

    a. Date of inspection and operator's initials.
    b. Name and location of loading equipment and amount of ROC liquid transferred.
    c. Description of any leak or malfunction of the vapor recovery or overfill prevention systems.
    d. Date component was repaired and type of repair, if applicable.
    e. Whether or not delivery vessels hatches are closed during filling and if any spillage occurred.
    f. Delivery vessel identification and name of delivery company.

Ventura County Air Pollution Control District
Rule 71.3.E.1 Applicable Requirements
ROC Liquid Loading Facilities
Low Vapor Pressure Exemption

Rule 71.3, "Transfer of Reactive Organic Compound Liquids"
Adopted 6/16/92, Federally-Enforceable

Applicability:

This attachment applies to ROC liquid loading facilities that are exempt from Rule 71.3 requirements, pursuant to the exemption of Rule 71.3.E.1. The exemption states that the provisions of this rule shall not apply to any equipment that transfers an ROC liquid with a modified Reid vapor pressure of less than 0.5 psia. This attachment does not apply to the transfer of gasoline, or to the transfer of ROC liquids via pipeline.

A loading facility is defined as any aggregation or combination of organic liquid loading equipment which is located so that all the organic liquid loading outlets for such aggregation or combination of loading equipment can be encompassed within any circle of 300 feet in diameter.

Conditions:

1. Pursuant to Rule 71.3.E.1, the loading facility shall not be used to transfer an ROC liquid with a modified Reid vapor pressure of greater than or equal to 0.5 psia.

2. Permittee shall annually determine the liquid vapor pressure of all products at the loading facility in order to certify that the modified Reid vapor pressure is less than 0.5 psia. Records of the vapor pressure determinations shall be maintained at the facility and submitted to the District with the annual compliance certification.

3. Pursuant to Rule 71.3.G.1 the method for determining the vapor pressure shall be as follows:

    a. For petroleum products, the modified Reid vapor pressure shall be measured at the product transfer temperature using ASTM Method No. D-323-82 Volume 5.01, Section 5.

    b. For an organic liquid, if the liquid is listed in Attachment 1 of Rule 71.2, and if the transfer temperature of the liquid does not exceed the maximum

temperature listed corresponding to 0.5 psia, then it shall be deemed exempt from Rule 71.3 requirements.

4. Permittee shall perform routine surveillance of the applicable transfer equipment to ensure that compliance with Rule 71.3.E.1 is being maintained. This routine surveillance shall include verifying that there is no change in the ROC liquid composition or method of operation.

Ventura County Air Pollution Control District
Rule 74.15.B.1 Applicable Requirements
Boilers, Heater Treaters, Steam Generators, and Process Heaters
NOx and CO Emission Limits
Annual Heat Input ≥ 9,000 MMBTU

Rule 74.15, "Boilers, Steam Generators, and Process Heaters"
Adopted 11/8/94, Federally-Enforceable

Applicability:

This attachment applies to boilers, heater treaters, steam generators and process heaters with a maximum heat input rating of greater than or equal to 5 MMBTU/Hr that have operated with an annual heat input rate of greater than or equal to 9,000 MMBTU during any twelve (12) calendar month rolling period. This attachment also applies to any unit operated with an annual heat input rate of less than 9,000 MMBTU that is equipped with low NOx burners or other such equipment to comply with the NOx and CO requirements of Rule 74.15.B.1. A heat input of 9,000 MMBTU is equivalent to 90,000 therms and equivalent to 8.57 million cubic feet of natural gas at a higher heating value of 1,050 BTU/cf.

A boiler, steam generator or process heater is any external combustion equipment fired with liquid and/or gaseous fuel. A boiler or a steam generator is further defined as equipment used to produce steam or to heat water. Boiler or steam generator does not include any unfired waste heat recovery boiler that is used to recover sensible heat from the exhaust of any combustion equipment. A process heater is further defined as equipment which transfers heat from combustion gases to water or process streams. Process heater does not include any kiln or oven used for drying, baking, cooking, calcinating or vitrifying, or any fuel-fired degreasing or metal finishing equipment. Annual heat input is defined as the actual amount of heat released by fuels burned in a unit during a twelve (12) calendar month rolling period, based on the higher heating value of the fuel. The annual heat input shall be calculated as the sum of the previous 12 monthly fuel use rates multiplied by the higher heating value of the fuel.

Conditions:

1. Pursuant to Rule 74.15.B.1, emissions from an applicable emission unit shall not exceed the following limits:

    a. Oxides of Nitrogen (NOx expressed as NO_2): 40 ppmvd
    b. Carbon Monoxide (CO): 400 ppmvd

These limits shall be referenced at three (3) percent volume stack gas oxygen on a dry basis averaged over 15 consecutive minutes. Compliance with this condition shall be verified every 24 months by source testing.

2. Pursuant to Rule 74.15.B.1, an applicable emission unit shall be source tested not less than once every 24 months (biennially) utilizing the following methods as detailed in Rule 74.15.E:

a.	NOx	ARB Method 100
b.	CO	ARB Method 100
c.	Stack Gas Oxygen	ARB Method 100

Pursuant to Rule 74.15.E.2, emission tests shall be conducted on units in "as-found" operating condition. However, no emission test for Rule 74.15 shall be conducted during start-up, shutdown or under breakdown conditions. Prior to conducting a biennial emissions test, permittee shall notify the District Enforcement Section. Written notification shall be received no less than 15 calendar days prior to the test. The emissions test report and results shall be submitted to the District Enforcement Section within 45 days after the test.

3. Pursuant to Rule 74.15.C.2, the emission limits of Rule 74.15.B.1 shall not apply to any unit operated on alternate fuel under the following conditions:

   a. Alternate fuel is required due to the curtailment of natural gas service to the individual unit by the natural gas supplier. Alternate fuel use in this case shall not exceed the period of natural gas curtailment.

   b. Alternate fuel use is required to maintain the alternate fuel system. Alternate fuel use in this case shall not exceed 50 hours per year.

4. Pursuant to Rule 74.15.C.4, the emission limits of Rule 74.15.B.1 shall not apply during the cold startup of an applicable unit. For units with a rated heat input capacity of equal to, or greater than, one hundred (100) million BTUs per hour, the duration of this exemption shall not exceed three (3) hours. For units with a rated heat input capacity of less than one hundred (100) million BTUs per hour, the duration of this exemption shall not exceed one (1) hour.

5. Permittee shall record and maintain the following information:

a. Daily records of alternate fuel consumption as required by Rule 74.15.D.3. Each record shall include the type of fuel, the quantity of fuel, and the duration of the occurrence; and

b. The biennial source test report.

This information shall be submitted to the District upon request.

6. If the emission unit is equipped with an external flue gas recirculation (FGR) system for the control of nitrogen oxides, permittee shall also comply with the FGR monitoring and recordkeeping requirements in the Permit Specific Conditions (Attachments) presented in Section No. 8 of this permit.

Ventura County Air Pollution Control District
Rule 74.15.1.B.1 Applicable Requirements
Boilers, Heater Treaters, Steam Generators, and Process Heaters
NOx and CO Emission Limits
Annual Heat Input ≥ 1,800 MMBTU

Rule 74.15.1, "Boilers, Steam Generators, and Process Heaters"
Federally-Enforceable Version Adopted 5/11/93
Federally-Enforceable OCS Version Adopted 6/13/95
District-Enforceable Version Adopted 6/13/95

Compliance with the conditions listed below for the 6/13/95 version of the rule will ensure compliance with both versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to boilers, heater treaters, steam generators and process heaters with a maximum heat input rating of greater than or equal to 1 MMBTU/Hr and less than 5 MMBTU/Hr that have operated with an annual heat input rate of greater than or equal to 1,800 MMBTU during any twelve (12) calendar month rolling period. This attachment also applies to any unit operated with an annual heat input rate of less than 1,800 MMBTU that is equipped with low NOx burners or other such equipment to comply with the NOx and CO requirements of Rule 74.15.1.B.1. A heat input of 1,800 MMBTU is equivalent to 18,000 therms and equivalent to 1.71 million cubic feet of natural gas at a higher heating value of 1,050 BTU/cf.

A boiler, steam generator or process heater is any external combustion equipment fired with liquid and/or gaseous fuel. A boiler or a steam generator is further defined as equipment used to produce steam or to heat water. Boiler or steam generator does not include any unfired waste heat recovery boiler that is used to recover sensible heat from the exhaust of any combustion equipment. A process heater is further defined as equipment which transfers heat from combustion gases to water or process streams. A process heater does not include any kiln or oven used for drying, baking, cooking, calcining or vitrifying, any unfired waste heat recovery heater that is used to recover sensible heat from the exhaust of any combustion equipment, or any fuel-fired degreasing or metal finishing equipment. Annual heat input is defined as the actual amount of heat released by fuels burned in a unit during a twelve (12) calendar month rolling period, based on the higher heating value of the fuel. The annual heat input shall be calculated as the sum of the previous 12 monthly fuel use rates multiplied by the higher heating value of the fuel.

Conditions:

1. Pursuant to Rule 74.15.1.B.1, emissions from an applicable emission unit shall not exceed the following limits:

   a. Oxides of Nitrogen (NOx expressed as NO_2): 30 ppmvd
   b. Carbon Monoxide (CO): 400 ppmvd

   These limits shall be referenced at three (3) percent volume stack gas oxygen on a dry basis averaged over 15 consecutive minutes. Compliance with this condition shall be verified every 24 months by source testing.

2. Pursuant to Rule 74.15.1.B.1, an applicable emission unit shall be source tested not less than once every 24 months (biennially) utilizing the following methods as detailed in Rule 74.15.1.E:

a.	NOx	ARB Method 100
b.	CO	ARB Method 100
c.	Stack Gas Oxygen	ARB Method 100

   Pursuant to Rule 74.15.1.E.2, emission tests shall be conducted on units in "As-found" operating condition. However, no emission test for Rule 74.15.1 shall be conducted during start-up, shutdown, or under breakdown conditions. Prior to conducting a biennial emissions test, permittee shall notify the District Enforcement Section. Written notification shall be received no less than 15 calendar days prior to the test. The emissions test report and results shall be submitted to the District Enforcement Section within 45 days after the test.

3. Pursuant to Rule 74.15.1.C, the emission limits of Rule 74.15.1.B.1 shall not apply to any unit operated on alternate fuel under the following conditions:

   a. Alternate fuel is required due to curtailment of natural gas service to the individual unit by the natural gas supplier. Alternate fuel use in this case shall not exceed the period of natural gas curtailment.

   b. Alternate fuel use is required to maintain the alternate fuel system. Alternate fuel use in this case shall not exceed 50 hours per year.

4. The permittee shall record and maintain the following information:

   a. Daily records of alternate fuel consumption as required by Rule 74.15.1.D.3. Each record shall include the type of fuel, the quantity of fuel, and the duration of the occurrence; and

   b. The biennial source test report.

   This information shall be submitted to the District upon request.

5. In addition to source testing, permittee shall perform routine surveillance of the applicable emission unit to ensure that compliance with Rule 74.15.1.B.1 is being maintained. This routine surveillance shall include verifying that the emission unit is functioning within its normal operating parameters.

Ventura County Air Pollution Control District
Rule 74.15.1 Applicable Requirements
Boilers, Heater Treaters, Steam Generators, and Process Heaters
Equipment Currently Shut Down and Not Operating

Rule 74.15.1, "Boilers, Steam Generators, and Process Heaters"
Federally-Enforceable Version Adopted 5/11/93
Federally-Enforceable OCS Version Adopted 6/13/95
District-Enforceable Version Adopted 6/13/95

Compliance with the conditions listed below for the 6/13/95 version of the rule will ensure compliance with both versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to boilers, heater treaters, steam generators and process heaters with a maximum heat input rating of greater than or equal to 1 MMBTU/Hr and less than 5 MMBTU/Hr that are currently shut down and not operating.

A boiler, steam generator or process heater is any external combustion equipment fired with liquid and/or gaseous fuel. A boiler or a steam generator is further defined as equipment used to produce steam or to heat water. Boiler or steam generator does not include any unfired waste heat recovery boiler that is used to recover sensible heat from the exhaust of any combustion equipment. A process heater is further defined as equipment which transfers heat from combustion gases to water or process streams. Process heater does not include any kiln or oven used for drying, baking, cooking, calcining or vitrifying, any unfired waste heat recovery heater that is used to recover sensible heat from the exhaust of any combustion equipment, or any fuel-fired degreasing or metal finishing equipment. Annual heat input is defined as the actual amount of heat released by fuels burned in a unit during a twelve (12) calendar month rolling period, based on the higher heating value of the fuel. The annual heat input shall be calculated as the sum of the previous 12 monthly fuel use rates multiplied by the higher heating value of the fuel.

Conditions:

1. Prior to operating an applicable emission unit, permittee shall:

    a. Notify the District Enforcement Section; and

b. Install a dedicated fuel meter pursuant to Rule 74.15.1.D.1. The meter shall be accurate to ± 1 percent, as certified by the manufacturer in writing.

2. Any applicable emission unit operated with an annual heat input rate of equal to or greater than 300 MMBTU and less than 1800 MMBTU shall comply with the tuning requirements of Rule 74.15.1.B.2.

3. Prior to operating any applicable emission unit with an annual heat input rate of equal to or greater than 1800 MMBTU, permittee shall demonstrate by source testing, using ARB Method 100 as detailed in Rule 74.15.1.E, that the unit complies with the nitrogen oxide (NOx) and carbon monoxide (CO) limits of Rule 74.15.1.B.1. If the unit requires physical modifications in order to meet the emission limits, permittee shall apply for and receive an Authority to Construct and Permit to Operate for the modification.

4. Permittee shall perform routine surveillance of the applicable emission unit to ensure that the equipment is currently shut down and not operating.

5. Upon operating an applicable emission unit, totalizing fuel meter records shall be compiled monthly into a rolling twelve (12) calendar month report. These records shall be submitted to the District upon request.

8. PERMIT SPECIFIC CONDITIONS (ATTACHMENTS)

As discussed in Section No. 2, “Permitted Equipment and Applicable Requirements Table”, the emissions units at this stationary source listed in the table have requirements that are specifically applicable to them. The applicable requirements are primarily based on Rule 26, “New Source Review” requirements (e.g., BACT and offset requirements), or Rule 29, “Conditions on Permits” requirements (e.g., throughput recordkeeping requirements, specific requirements that limit emissions, etc.). These requirements are in addition to the specific applicable requirements listed in Section No. 7.

In this section of the permit, the permit conditions that are associated with each specific applicable requirement are listed in an individual attachment. The attachment is identified with the label “Attachment PO (Title V Permit No.) PC#” in the lower left corner. Each attachment has an applicability section that describes how and why this attachment applies to the specific emissions unit. The attachment may apply to one or more of the emissions units listed in the Permitted Equipment and Applicable Requirements Table in Section No. 2.

Ventura County Air Pollution Control District
Additional Permit Requirements
Tenby Inc.

Rule 26, "New Source Review"

Rule 29, "Conditions on Permits"

Conditions applied pursuant to Rule 26 are federally enforceable and conditions applied pursuant to Rule 29 are District enforceable only.

Applicability:

This attachment applies to the Tenby, Inc. facility. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. In order to comply with the throughput and consumption limits of this permit, the permittee shall maintain monthly records of throughput and consumption as detailed in Section No. 3, "Permitted Throughput and Consumption Limit Table", of this permit. The monthly records shall be summed for the previous 12 months. Throughput or consumption totals for any of these 12 calendar month rolling periods in excess of the specified limit shall be considered a violation of this permit. This is a general throughput and consumption recordkeeping condition and applies unless another throughput and consumption recordkeeping condition appears in this section of the permit. (Rules 26 and 29)

2. The permitted emissions authorized by this permit are based in part on the fugitive emissions from 86 oil wells. An Authority to Construct is required to be obtained from the District prior to drilling a new oil well. Emission offsets must also be provided with the submittal of any application to increase the number of wells beyond 86 wells. (Rule 29)

3. For solvent cleaning activities, including wipe cleaning, permittee shall maintain monthly records of solvent purchase and usage along with records of solvent that is recycled or disposed of properly. Pursuant to Rule 23.F.7, solvents used for facility and building maintenance and repair are exempt from the permit. Facility maintenance and repair does not include the use of solvents for maintenance and repair of process and industrial equipment when this activity is being conducted by contractors. The monthly records shall be summed for the previous 12 months.

Net solvent usage totals for any of these 12 calendar month rolling periods in excess of the specified limit shall be considered a violation of this permit. (Rule 29)

Ventura County Air Pollution Control District
Additional Permit Requirements
Nitrite Solution Vessels

Rule 64, "Sulfur Content of Fuels"
Federally-Enforceable Version Adopted 7/5/83
District-Enforceable Version Adopted 6/14/94

Compliance with the conditions listed below will ensure compliance with both versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to the nitrite solution vessels or nitrite solution buffer vessels located at the Tenby, Inc. facility. These vessels are used to sweeten, or remove hydrogen sulfide from, gas produced from wells at this facility. These requirements are in addition to any other specific or general requirements referenced in this permit**.**

Conditions:

1. All produced gas and casing gas shall be processed through the nitrite solution produced gas sweetening system.

2. The produced gas and casing gas shall not be burned as fuel in the boilers, steam generators or process heaters if the gas contains sulfur compounds, calculated as hydrogen sulfide at standard conditions, in excess of 236 ppmv, or the equivalent 15 grains per 100 cubic feet.

3. On a weekly basis, permittee shall test the hydrogen sulfide content of the gases downstream of the nitrite solution vessels or nitrite solution buffer vessels located throughout the facility. The tests shall be performed using detector tubes that measure hydrogen sulfide. Permittee shall maintain this test information and make it available to the District upon request.

4. Permittee shall analyze the sulfur content of this fuel gas on an annual basis using South Coast AQMD Method 307-94 - Determination of Sulfur in a Gaseous Matrix. This annual fuel gas analysis shall satisfy the requirements of Permit Condition No. 2 above, as well as the requirements of Rule 64.B.1. Records of the test shall be maintained at the facility and the test results shall be provided to the District with the annual compliance certification.

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Ventura County Air Pollution Control District
Additional Permit Requirements
20 MMBTU/Hr Erie City Boiler

Rule 26, "New Source Review"

Rule 74.15, "Boilers, Steam Generators, and Process Heaters"
Adopted 11/8/94, Federally-Enforceable

Conditions applied pursuant to Rule 26 are federally enforceable.

Applicability:

This attachment applies to the 20 MMBTU/Hr Erie City boiler located at the Tenby, Inc. facility. These requirements are in addition to any other specific or general requirements referenced in this permit**.**

Conditions:

1. The stack outlet concentrations of oxides of nitrogen (NOx measured as NO2) shall not exceed 36 parts per million by volume (ppmv) corrected to 3 percent oxygen. This is a requirement of Rule 26 as detailed in Authority to Construct No. 0012-110. (Rule 26)

2. Permittee shall operate the Erie City boiler at a flue gas recirculation (FGR) rate at or above a valve opening setting of 45%, and an excess oxygen rate between 0.5% and 3.0%. These operating parameters shall be monitored, measured, and recorded on a monthly basis. Any deviation from the minimum FGR valve position of 45% or any deviation from the excess oxygen rate range shall be considered a violation of this condition, unless the permittee can demonstrate compliance with the NOx emission limits specified in Permit Condition No. 1 above by emission testing pursuant to Rule 74.15. (Rule 26 and Rule 74.15)

3. Permittee shall have the boiler emissions tested no less than once every 24 months and shall maintain the external flue gas recirculation system (FGR) according to the parameters specified in Permit Condition No. 2 above. Additional monitoring, recordkeeping, reporting, and test method requirements for this unit are included in Attachment 74.15N1 in Section No. 7 of this permit. (Rule 26 and Rule 74.15)

Ventura County Air Pollution Control District
Additional Permit Requirements
20 MMBTU/Hr Natco Crude Oil Process Heater

Rule 26, "New Source Review"

Rule 74.15, "Boilers, Steam Generators, and Process Heaters"
Adopted 11/8/94, Federally-Enforceable

Conditions applied pursuant to Rule 26 are federally enforceable.

Applicability:

This attachment applies to the 20 MMBTU/Hr Natco crude oil process heater located at the Tenby, Inc. facility. These requirements are in addition to any other specific or general requirements referenced in this permit**.**

Conditions:

1. The stack outlet concentrations of oxides of nitrogen (NOx measured as NO2) shall not exceed 34 parts per million by volume (ppmv) corrected to 3 percent oxygen. This is a requirement of Rule 26 as detailed in Authority to Construct No. 0012-110. (Rule 26)

2. Permittee shall operate the Natco crude oil process heater at a flue gas recirculation (FGR) rate at or above a valve opening setting of 50%, and an excess oxygen rate between 0.5% and 2.5%. These operating parameters shall be monitored, measured, and recorded on a monthly basis. Any deviation from the minimum FGR valve position of 50% or any deviation from the excess oxygen rate range shall be considered a violation of this condition, unless the permittee can demonstrate compliance with the NOx emission limits specified in Permit Condition No. 1 above by emission testing pursuant to Rule 74.15. (Rule 26 and Rule 74.15)

3. Permittee shall have the heater emissions tested no less than once every 24 months and shall maintain the external flue gas recirculation system (FGR) according to the parameters specified in Permit Condition No. 2 above. Additional monitoring, recordkeeping, reporting, and test method requirements for this unit are included in Attachment 74.15N1 in Section No. 7 of this permit. (Rule 26 and Rule 74.15)

Ventura County Air Pollution Control District
Additional Permit Requirements
20 MMBTU/Hr Steam Generators
(Steam Generator Nos. 0, 1, 2, 3, 4, and 5)

Rule 26, "New Source Review"

Rule 29, "Conditions on Permits"

Rule 74.15, "Boilers, Steam Generators, and Process Heaters"
Adopted 11/8/94, Federally-Enforceable

Conditions applied pursuant to Rule 26 are federally enforceable and conditions applied pursuant to Rule 29 are District enforceable.

Applicability:

This attachment applies to the six (6) 20 MMBTU/Hr steam generators located at the Tenby, Inc. facility. These requirements are in addition to any other specific or general requirements referenced in this permit**.**

Conditions:

1. Permittee may burn fuel oil in Steam Generator Nos. 3, 4, and 5 at a maximum rate of 118.2 gallons per hour during periods of mandatory natural gas curtailment by the natural gas supplier. Prior to obtaining approval to burn fuel oil at a higher rate during curtailment, permittee must demonstrate through source testing that these steam generators can meet an oxides of nitrogen (NOx measured as NO2) emission limit of 160 parts per million by volume (ppmv) on a dry basis corrected to 3 percent oxygen while burning fuel oil. (Rule 26)

   If the permittee desires to burn fuel oil during periods of time other than natural gas curtailment, compliance with the 40 ppmv NOx and 400 ppmv CO limits of Rule 74.15.B.1 shall be demonstrated prior to such fuel oil burning. (Rule 74.15)

2. The fuel to be burned during commercial operation of Steam Generator No. 0 shall be limited to utility natural gas only. Prior to obtaining approval to burn fuel oil, permittee must demonstrate through source testing that Steam Generator No. 0 can meet an oxides of nitrogen (NOx measured as NO2) emission limit of 40 parts per million by volume (ppmv) on a dry basis corrected to 3 percent oxygen while burning fuel oil, and can meet a carbon monoxide (CO) emission limit of 400 parts

per million (ppmv) on a dry basis corrected to 3 percent oxygen while burning fuel oil. (Rule 26 and Rule 74.15)

3. The fuel to be burned during commercial operation of Steam Generator Nos. 1 and 2 shall be limited to utility natural gas only. Prior to obtaining approval to burn fuel oil during periods of mandatory natural gas curtailment by the natural gas supplier, permittee must demonstrate through source testing these steam generators can meet an oxides of nitrogen (NOx measured as NO2) emission limit of 160 parts per million by volume (ppmv) on a dry basis corrected to 3 percent oxygen while burning fuel oil. (Rule 26)

   If the permittee desires to burn fuel oil during periods of time other than natural gas curtailment, compliance with the 40 ppmv NOx and 400 ppmv CO limits of Rule 74.15.B.1 shall be demonstrated prior to such fuel oil burning. (Rule 74.15)

4. The fuel oil to be burned in Steam Generator Nos. 3, 4, and 5 shall be limited to a sulfur content not to exceed 0.25%, by weight, and a nitrogen content not to exceed 0.25%, by weight. In order to comply with this condition, permittee shall maintain fuel records, or certification from the fuel supplier, documenting the sulfur content and nitrogen content of each fuel delivery. (Rule 29)

5. A totalizing fuel meter shall be installed and dedicated to each steam generator. The meter shall be accurate to ± one percent and shall be maintained in proper operating condition. (Rule 29)

6. Permittee shall maintain the following flue gas recirculation (FGR) valve opening settings and excess oxygen trim rates:

Steam Generator No.	Valve Opening Setting	Excess Oxygen Rates
0	10 %	0.5 - 2.5 %
1	30 %	0.5 - 2.5 %
2	30 %	0.5 - 2.5 %
3	45 %	0.5 - 2.5 %
4	40 %	0.5 - 2.5 %
5	60 %	0.5 - 2.5 %

   These operating parameters shall be monitored, measured, and recorded on a monthly basis. Any FGR valve setting less than the FGR valve position setting above, or any deviation from the excess oxygen rates above shall be considered a violation of this condition, unless the permittee can demonstrate compliance with

40 ppmv NOx by emission testing pursuant to Rule 74.15. (Rule 26 and Rule 74.15)

7. Permittee shall have the steam generators' emissions tested no less than once every 24 months and shall maintain the external flue gas recirculation system (FGR) according to the parameters specified in Permit Condition No. 6 above. Additional monitoring, recordkeeping, reporting, and test method requirements for these units are included in Attachment 74.15N1 in Section No. 7 of this permit.

Ventura County Air Pollution Control District
Additional Permit Requirements
Asphalt Loading Racks

Rule 51, "Nuisance"
Adopted 10/22/68, District Enforceable Only

Applicability:

This attachment applies to the asphalt loading racks located at the Tenby, Inc. facility. These requirements are in addition to any other specific or general requirements referenced in this permit**.**

Conditions:

1. Pursuant to Rule 51, permittee shall operate and maintain a vapor collection and scrubbing system at the asphalt loading racks during all asphalt transfer operations in order to reduce any nuisance created by odor. The vapor collection and filtration system shall minimize displaced vapors from being released into the atmosphere during loading operations by collecting the displaced ROC vapors from the delivery vessel, and passing these vapors through a water scrubber and filtration system prior to release to the atmosphere.

2. Permittee shall perform routine surveillance to ensure that the vapor collection and scrubbing system is operating properly.

Ventura County Air Pollution Control District
Additional Permit Requirements
Crude Oil and Gas Oil Loading Racks

Rule 71.3, "Transfer of Reactive Organic Compound Liquids"
Adopted 6/16/92, Federally-Enforceable

Rule 26, "New Source Review"

Conditions applied pursuant to Rule 26 are federally enforceable.

Applicability:

This attachment applies to the crude oil loading racks located at the Transamerica Tank C-1 area, Texcon Tank C-2 and C-3 area, and the Tenby, Inc. Main Facility Tank 2005-2006 area. This attachment also applies to gas oil loading rack at the Tenby, Inc. Main Facility Tank 1501-1503 area. These requirements are in addition to any other specific or general requirements referenced in this permit**.**

Conditions:

1. Regardless of the applicability, requirements, or exemptions of Rule 71.3, permittee shall maintain a bottom-loaded vapor recovery system at the crude oil and gas oil loading racks during all transfer operations. The vapor recovery system shall prevent all displaced vapors during loading from being released into the atmosphere. The vapor recovery system shall be capable of collecting all ROC vapors, and shall have a vapor return system that routes all vapors to a continuously operating boiler firebox for incineration or to a gas pipeline recovery and distribution system. Additional monitoring, recordkeeping, reporting, and test method requirements for these units are included in Attachment 71.3N4 in Section No. 7 of this permit.

   This is a requirement of Rule 26 as detailed in Application No. 0011-008 for Emission Reduction Credits as a result of adding vapor recovery to these crude oil and gas oil loading racks.

9. GENERAL APPLICABLE REQUIREMENTS (ATTACHMENTS)

The general applicable requirements are broadly applicable requirements that apply and are enforced in the same manner for all subject emissions units or activities. These requirements can normally be adequately addressed in the permit application with minimal or no reference to any specific emissions unit or activity, provided that the scope of the requirement and the manner of its enforcement are clear. Examples of such requirements include those that apply identically to all emissions units at a facility (e.g., source-wide opacity limits), general housekeeping requirements, and requirements that apply identical emissions limits to small units (e.g., process weight requirements).

As detailed in the Title V Permit Application General Applicable Requirements Form, Form TV AF25, general applicable requirements that apply to this facility were determined. The permit conditions associated with each generally applicable requirement are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No.) ____" in the lower left corner of each attachment. Each attachment has an applicability section that describes the emissions units to which the attachment applies. Each attachment may apply to one or more of the emissions units listed in the Applicable Requirements Table of Section No. 2. Note that these general applicable requirements may also apply to emissions units not required to be listed in the permit, such as those that are short-term.

Ventura County Air Pollution Control District
Rule 50 Applicable Requirements
Opacity

Rule 50, "Opacity"
Federally-Enforceable Version Adopted 5/23/72
Federally-Enforceable OCS Version Adopted 2/20/79
District-Enforceable Version Adopted 2/20/79

Compliance with the conditions listed below will ensure compliance with both versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to all emissions units at this stationary source.

Conditions:

1. Pursuant to Rule 50, permittee shall not discharge into the atmosphere any air contaminants for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, or equivalent to 20% opacity and greater, unless specifically exempted by Rule 50.

2. Permittee shall perform routine surveillance and visual inspections to ensure that compliance with Rule 50 is being maintained. A record shall be kept of any occurrence of visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. These records shall include the date, time, and identity of emissions unit. If the visible emissions problem cannot be corrected within 24 hours, permittee shall provide verbal notification to the District within the subsequent 24 hours. These visible emissions records shall be maintained at the facility and submitted to the District upon request.

3. On an annual basis, permittee shall certify that all emissions units at the facility are complying with Rule 50. This annual compliance certification shall include a formal survey identifying the date, time, emissions unit, and verification that there are no visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. As an alternative, the annual compliance certification shall include a formal survey

identifying the date, time, emissions unit, and verification that there are no visible emissions for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, or equivalent to 20% opacity and greater, as determined by a person certified in reading smoke using EPA Method 9.

4. Upon District request, opacity shall be determined during routine surveillance and during the annual compliance certification by a person certified in reading smoke using EPA Method 9 or a certified, calibrated monitoring system.

Ventura County Air Pollution Control District
Rule 52 Applicable Requirements
Particulate Matter - Concentration (Grain Loading)

Rule 52, "Particulate Matter - Concentration (Grain Loading)"
Adopted 5/23/72, Federally-Enforceable

Applicability:

This attachment applies to all external combustion emissions units and internal combustion engines at this stationary source that burn either natural gas or fuel oil. This attachment does not apply to steam generators or gas turbines while combusting liquid or gaseous fuels.

Conditions:

1. Pursuant to Rule 52, permittee shall not discharge into the atmosphere from any source particulate matter in excess of the concentration listed in the table shown in Rule 52. For the purpose of Rule 52, particulate matter includes any material which would become particulate matter if cooled to standard conditions.

2. Periodic monitoring is not necessary to certify compliance with Rule 52. To certify compliance, a reference to the District analysis of Rule 52 compliance based on EPA emission factors is sufficient.

Ventura County Air Pollution Control District
Rule 54 Applicable Requirements
Sulfur Compounds - Sulfur Emissions from
Combustion Operations at Point of Discharge

Rule 54, "Sulfur Compounds"
Federally-Enforceable Version Adopted 7/5/83
District-Enforceable Version Adopted 6/14/94

Rule 64, "Sulfur Content of Fuels"
Federally-Enforceable Version Adopted 7/5/83
Federally-Enforceable OCS Version Adopted 6/14/94
District-Enforceable Version Adopted 6/14/94

Compliance with the conditions listed below will ensure compliance with both versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to all combustion emissions units at this stationary source that combust gaseous or liquid fuels. This attachment addresses the requirements of Rule 54 for sulfur emissions at the point of discharge. It can be demonstrated that compliance with the fuel sulfur content limits of Rule 64 ensures compliance with the sulfur emission limits of Rule 54.

Conditions:

1. Pursuant to Rule 54, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, in excess of 300 ppm by volume from any combustion operation, calculated as sulfur dioxide (SO_2) by volume at the point of discharge.

2. In order to comply with Rule 54, permittee shall comply with the fuel sulfur content limits of Rule 64. No additional periodic monitoring requirements for Rule 54 are required beyond the periodic monitoring requirements of Rule 64.

3. Upon District request, sulfur compounds at the point of discharge shall be determined by source testing using EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or South Coast AQMD Test Method 307-94 (Determination of Sulfur in a Gaseous Matrix), as appropriate.

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Ventura County Air Pollution Control District
Rule 54 Applicable Requirements
Sulfur Compounds - Sulfur Dioxide Concentration at Ground Level

Rule 54, "Sulfur Compounds"
Federally-Enforceable Version Adopted 7/5/83
District-Enforceable Version Adopted 6/14/94

Compliance with the conditions listed below will ensure compliance with both versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to all emissions units at this stationary source that emit sulfur compounds. This attachment addresses the requirements of Rule 54 for sulfur emissions at ground or sea level at or beyond the property line of the stationary source.

Conditions:

1. Pursuant to Rule 54, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, as sulfur dioxide which results in average ground or sea level concentrations at any point at or beyond the property line in excess of 0.25 ppmv averaged over any one hour period, or 0.04 ppmv averaged over any 24 hour period.

2. Permittee shall maintain a representative fuel analysis or exhaust analysis, along with modeling data or other demonstration to ensure that compliance with Rule 54 is being maintained. This analysis and compliance demonstration shall be provided to the District upon request.

3. Upon District request, ground or sea level concentrations of SO_2 shall be determined by Bay Area Air Quality Management District Manual of Procedures, Volume VI, Section 1, Ground Level Monitoring for Hydrogen Sulfide and Sulfur Dioxide with the following amendments:

    a. The wind direction shall be continuously measured and recorded to within 5 degrees of arc, and wind speed shall be continuously measured and recorded to within 0.25 miles per hour (mph) at wind speeds less than 25 mph and with a threshold no greater than 0.2 mph.

b. The meteorological instruments and siting requirements shall comply with the guidelines in "Quality Assurance Handbook for Air Pollution Measurements Systems, Volume IV, Meteorological Measurements," EPA/600/4-90/003.

c. The gas standards shall be restandardized against the reference wet chemical method at a minimum of once every 12 months, or be standardized using National Institute of Standards and Technology (NIST) standard gases.

Ventura County Air Pollution Control District
Rule 57.B Applicable Requirements
Combustion Contaminants - Specific - Fuel Burning Equipment

Rule 57.B, "Combustion Contaminants - Specific", Fuel Burning Equipment
Federally-Enforceable Version Adopted 8/17/76
Federally-Enforceable OCS Version Adopted 6/14/77
District-Enforceable Version Adopted 6/14/77

Compliance with the conditions listed below for the 6/14/77 version of the rule will ensure compliance with both versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to all external combustion emission units, internal combustion engines, and gas turbines at this stationary source that burn either natural gas or fuel oil.

Conditions:

1. Pursuant to Rule 57.B, permittee shall not discharge into the atmosphere from any fuel burning equipment combustion contaminants exceeding in concentration at the point of discharge, 0.1 grain per cubic foot of gas calculated to 12 percent of carbon dioxide (CO_2) at standard conditions.

   Combustion contaminants are defined as particulate matter discharged into the atmosphere from the burning of any kind of material containing carbon in a free or combined state.

2. Periodic monitoring is not necessary to certify compliance with Rule 57.B. To certify compliance, a reference to the District analysis based on EPA emission factors and a representative source test is sufficient.

Ventura County Air Pollution Control District
Rule 64 Applicable Requirements
Sulfur Content of Fuels - Gaseous Fuel Requirements

Rule 64, "Sulfur Content of Fuels"
Federally-Enforceable Version Adopted 7/5/83
Federally-Enforceable OCS Version Adopted 6/14/94
District-Enforceable Version Adopted 6/14/94

Compliance with the conditions listed below will ensure compliance with both versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to all combustion emissions units at this stationary source while the emissions units are combusting gaseous fuel.

Conditions:

1. Pursuant to Rule 64, no person shall burn at any time gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel (788 ppmv), except for natural gas which is limited to 15 grains per 100 cubic feet (236 ppmv), calculated as hydrogen sulfide at standard conditions, unless specifically exempted by Rule 64. Natural gas is a gaseous fuel purchased or transported under a Federal Energy Regulatory Commission or a California Public Utility Commission (PUC) jurisdictional tariff.

2. If only PUC-quality natural gas is combusted at this facility, it will be assumed that the permittee is complying with Rule 64 without additional periodic monitoring requirements.

3. If other than PUC-quality natural gas is being combusted, the permittee shall analyze the sulfur content of the fuel on an annual basis using South Coast AQMD Method 307-94 - Determination of Sulfur in a Gaseous Matrix. This annual fuel analysis shall be maintained at the facility and shall be provided to the District with the annual compliance certification.

Ventura County Air Pollution Control District
Rule 64 Applicable Requirements
Sulfur Content of Fuels - Solid or Liquid Fuel Requirements

Rule 64, "Sulfur Content of Fuels"
Federally-Enforceable Version Adopted 7/5/83
Federally-Enforceable OCS Version Adopted 6/14/94
District-Enforceable Version Adopted 6/14/94

Compliance with the conditions listed below will ensure compliance with both versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to all combustion emissions units at this stationary source while the emissions units are combusting solid or liquid fuel. This attachment does not apply to any combustion emission unit with sulfur emission controls.

Conditions:

1. Pursuant to Rule 64, no person shall burn any solid or liquid fuels with a sulfur content in excess of 0.5 percent, by weight, unless specifically exempted by Rule 64.

2. For each solid or liquid fuel delivery, permittee shall either obtain the fuel supplier's certification, or shall test the sulfur content of the fuel using ASTM Method D4294-83 or D2622-87, to ensure that compliance with Rule 64 is being maintained. The fuel sulfur content by weight data shall be maintained at the facility and shall be provided with the annual compliance certification.

Ventura County Air Pollution Control District
Rule 68 Applicable Requirements
Carbon Monoxide

Rule 68, "Carbon Monoxide"
Federally-Enforceable Version Adopted 5/23/72
Federally-Enforceable OCS Version Adopted 6/14/77
District-Enforceable Version Adopted 6/14/77

Compliance with the conditions listed below will ensure compliance with both versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to all external combustion emission units at this stationary source that burn either natural gas or fuel oil. This attachment does not apply to internal combustion engines.

Conditions:

1. Pursuant to Rule 68, permittee shall not discharge into the atmosphere carbon monoxide (CO) in concentrations exceeding 2,000 ppm by volume measured on a dry basis at standard conditions.

2. Periodic monitoring is not necessary to certify compliance with Rule 68. To certify compliance, a reference to the District analysis of Rule 68 compliance based on EPA emission factors is sufficient.

Ventura County Air Pollution Control District
Rule 71.1.C Applicable Requirements
Crude Oil Production and Separation - Produced Gas

Rule 71.1, "Crude Oil Production and Separation"
Adopted 6/16/92, Federally-Enforceable

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"
Adopted 6/16/92, Federally-Enforceable

Applicability:

This attachment applies to the emissions of produced gas from equipment used in the production, gathering, storage, processing, and separation of crude oil and natural gas from any petroleum production unit prior to custody transfer. Specifically, this attachment applies to gas collection systems that are hard-piped and closed systems that direct all produced gas to a fuel or sales gas system or to a flare.

Conditions:

1. Pursuant to Rule 71.1.C.1, the emissions of produced gas shall be controlled at all times using a properly maintained and operated closed system that directs all gas, except gas used in a tank battery vapor recovery system, to one of the following:

    a. A fuel or sales gas system
    b. A flare that combusts reactive organic compounds

2. Pursuant to Rule 71.1.C.2, the provisions of Rule 71.1.C.1 shall not apply to wells which are undergoing routine maintenance, or to exploratory wells (during the first two weeks of production) if the composition of the produced gas is unknown (i.e., new reservoir) and there are no existing gas handling systems within 150 feet of the well.

3. Permittee shall annually certify the produced gas collection system to ensure that compliance with Rules 71.1.C.1 is being maintained. This annual certification shall include a visual inspection assuring that the produced gas collection system is a closed system.

4. If a flare is used to control the produced gas, permittee shall inspect the flare on a quarterly basis to ensure that it is operating properly. A record of these

inspections shall be maintained at the facility and shall be submitted to the District upon request.

5. The gas collection system's gas and liquid piping connections are components subject to the leak requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities". Compliance with Rule 74.10 at the gas collection system ensures compliance with the maintenance requirements of Rule 71.1.C.1.

Ventura County Air Pollution Control District
Rule 71.4.B.1 Applicable Requirements
First Stage Sump Prohibition

Rule 71.4, "Petroleum Sumps, Pits, Ponds, and Well Cellars"
Adopted 6/8/93, Federally-Enforceable

Applicability:

This attachment applies to any first stage production sump at this stationary source. A first stage production sump is a sump that receives a stream of petroleum material directly from wells or a field gathering system. A sump is a receptacle, formed primarily of earthen materials, although it may be lined with artificial materials. A sump is further defined as "in continuous use for separating oil, water, sand, or other material in petroleum production operations".

Conditions:

1. Pursuant to Rule 71.4.B.1, no person shall install, maintain, or operate a first stage production sump. A first stage production sump is a sump that receives a stream of petroleum material directly from wells or a field gathering system.

2. In order to ensure that compliance with Rule 71.4.B.1 is being maintained, permittee shall annually certify that there are no first stage production sumps at the facility.

Ventura County Air Pollution Control District
Rule 71.4.B.3 Applicable Requirements
Well Cellar Storage Prohibition

Rule 71.4, "Petroleum Sumps, Pits, Ponds and Well Cellars"
Adopted 6/8/93, Federally Enforceable

Applicability:

This attachment applies to any well cellar at this stationary source. This attachment addresses the requirements of Rule 71.4.B.3 which prohibits the storage of crude oil or petroleum material in a well cellar. Rule 71.4 applies to well cellars at facilities where crude oil or petroleum material is produced, gathered, separated, processed, or stored.

A well cellar is a lined or unlined area around one or more oil wells, allowing access to the wellhead components for servicing and/or installation of blowout prevention equipment.

Conditions:

1. Pursuant to Rule 71.4.B.3, no person shall store crude oil or petroleum material in a well cellar except during periods of equipment maintenance or well workover. In no case shall storage occur for more than five (5) calendar days.

2. Pursuant to Rule 71.4.C, the provisions of Rule 71.4 shall not apply to well cellars used in an emergency, if clean-up procedures are implemented within 24 hours after each emergency occurrence and if clean-up procedures are completed within fifteen (15) calendar days.

3. Permittee shall perform routine surveillance and visual inspections of well cellars to ensure that compliance with Rule 71.4.B.3 is being maintained.

4. Pursuant to Rule 71.4.D.2, any person storing crude oil in a well cellar during periods of equipment maintenance or well workover shall maintain records, which may include but are not limited to, workover invoice documents, indicating the date(s) the material was stored in the well cellar or the date(s) of workover activity. These records shall be submitted to the District upon request.

Ventura County Air Pollution Control District
Rule 74.6 Applicable Requirements
Surface Cleaning and Degreasing

Rule 74.6, "Surface Cleaning and Degreasing"
Federally-Enforceable Version Adopted 12/10/91
Federally-Enforceable OCS Version Adopted 5/8/90
District-Enforceable Version Adopted 7/9/96

Compliance with the conditions listed below for the 7/9/96 version of the rule will ensure compliance with all three versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to all solvent cleaning activities at this stationary source. This attachment does not apply to cleanup and substrate surface preparation regulated by other APCD surface coating and solvent rules. Solvent cleaning is defined as the use of organic solvent to remove loosely held uncured adhesives, uncured inks, uncured coatings, and other contaminants which include, but are not limited to, dirt, soil, lubricants, coolant, moisture, grease, and fingerprints, from parts, tools, machinery, equipment, and general work areas.

Pursuant to APCD Rule 23.F.7, solvents used by the permittee for facility, ground, and building maintenance and repair are exempt from the requirement to have a permit. However, such solvents are required to comply with Rule 74.6.

Surface cleaning conducted in a degreaser that complies with the requirements of APCD Rule 74.6.1, "Cold Cleaners", APCD Rule 74.6.2, "Batch Loaded Vapor Degreasers", or APCD Rule 74.6.3, "Conveyorized Degreasers", are exempt from the solvent requirements and cleaning devices and methods requirements of Rule 74.6.B.1 and 74.6.B.2.

Conditions:

1. Pursuant to Rule 74.6.B.1, effective July 9, 1997, solvent cleaning activities shall meet the following requirements:

    a. Solvents used for repair and maintenance cleaning shall not exceed an ROC content of 900 grams per liter and an ROC composite partial pressure of 20 mmHg at 20^{o}C, as applied.

b. Solvents used for cleanup, including cleaning of application equipment, shall not exceed an ROC content of 950 grams per liter and an ROC composite partial pressure of 35 mmHg at 20^{o}C, as applied.

c. Solvents used for manufacturing or surface preparation shall not exceed an ROC content of 70 grams per liter.

2. Pursuant to Rule 74.6.B.2, effective July 9, 1997, no person shall perform solvent cleaning unless one of the following cleaning devices or methods is used:

a. Wipe cleaning where solvent is dispensed to wipe cleaning materials from containers that are kept closed to prevent evaporation, except while dispensing solvent or replenishing the solvent supply;

b. Application of solvent from a hand held spray bottle, squirt bottle or other closed container with a capacity of one liter or less;

c. Non-atomized solvent flow, dip, or flush method where pooling is prevented or drained, and all solvent runoff is collected in a manner that enables solvent recovery or disposal. The collection system shall be kept closed to prevent evaporation except while collecting solvent runoff or emptying the collection system;

d. A properly used enclosed gun washer or low emission spray gun cleaner.

3. Pursuant to Rule 74.6.B.3.a, no person shall atomize solvent into open air.

4. Pursuant to Rule 74.6.B.3.b, no person shall allow liquid cleaning solvent to leak from any equipment or container.

5. Pursuant to Rule 74.6.B.4.a, all ROC-containing solvents shall be stored in non-absorbent, non-leaking containers which shall be kept closed at all times except when filling or emptying.

6. Pursuant to Rule 74.6.B.4.b, all waste solvent and waste solvent residues shall be disposed of in a manner conforming with Division 20, Chapter 6.5 of the California Health and Safety Code.

7. Pursuant to Rule 74.6.C.1, Rule 74.6 shall not apply to:

a. Cleaning activities using cleaning agents that contain two percent or less organic solvent, as applied by weight.

b. Cleaning activities using solvents which are purchased in, and applied from, manufacturer- or distributor-labeled containers of one liter or less in volume, including aerosol products.

c. Janitorial cleaning including graffiti removal.

d. Cleaning activities conducted at residences, schools, medical care facilities, prisons, restaurants, health clubs and theaters.

e. Stripping of cured coatings (e.g.; stripping), cured adhesives (e.g.; debonding, ungluing), and cured inks.

f. Cleaning activities subject to any provision, including recordkeeping and exemption provisions, of the APCD Rules listed in Rule 74.6.C.1.f.

8. Pursuant to Rule 74.6.C.2, Rule 74.6 shall not apply to:

a. Any cleaning device or mechanism and associated operating conditions which has been approved in writing by the Air Pollution Control Officer (and which may be operated pending approval by the Environmental Protection Agency and the California Air Resources Board) to result in emissions lower than the emissions that would result if the cleaning were performed in compliance with the requirements of those rules.

b. Any cleaning device or mechanism for which emissions are regulated by National Emission Standards for Halogenated Solvent Cleaning, 40 CFR Parts 9 and 63, Subpart T, Sections 63.460 through 63.469 (Degreasing MACT Standards).

9. Pursuant to Rule 74.6.C.3, Rule 74.6.B.1 shall not apply to:

a. Cleaning of electronic components or medical devices using solvent with an ROC composite partial pressure of 33 mm Hg at 20°C or less and an ROC content of 900 g/l or less. The use of isopropyl alcohol shall be deemed in compliance with this requirement.

b. Cleaning of solar cells, laser hardware, scientific instruments, or high-precision optics.

c. Cleaning in laboratory tests and analyses, or bench scale or short term research and development programs.

d. Removal of elemental sodium from the inside of pipes and lines.

e. Cleaning of mold release compounds from molds.

f. Cleaning of tools used to cut or abrade cured magnetic oxide coatings.

g. Cleaning of aerospace assembly and subassembly surfaces that are exposed to strong oxidizers or reducers such as nitrogen tetroxiode, liquid oxygen or hydrazine.

h. Facilitywide use of less than 1 gallon per week of non-compliant solvent where compliant solvents are not available. Any person claiming this exemption shall maintain records of the volume and formulation of non-compliant solvent used on a weekly basis.

10. Pursuant to Rule 74.6.C.4, Rule 74.6.B.1 and Rule 74.6.B.2 shall not apply to:

a. Aircraft engine gas path cleaning or stationary gas turbine gas path cleaning using solvent with an ROC content of 200 g/l as applied or less.

b. Surface cleaning conducted in a degreaser that complies with the requirements of APCD Rules 74.6.1, 74.6.2, or 74.6.3, as applicable.

11. Pursuant to Rule 74.6.D, permittee shall maintain a current material list showing each ROC containing material used in solvent cleaning activities. The list shall summarize the following information:

a. Solvent name and manufacturer's description.

b. All intended uses of the solvent at the facility, classified as follows:

1. Repair or maintenance cleaning, or

2. Cleanup, including application equipment cleaning, or

3. Manufacturing or surface preparation cleaning, or

4. Solvent used pursuant to an exemption in Rule 74.6.C (specify the exemption claimed).

c. The ROC content (and ROC composite partial pressure, if applicable) of the solvent.

d. If the solvent is a mix of materials blended by the operator, a record of the mix ratio.

This information shall be submitted to the District upon request.

12. Permittee shall perform routine surveillance of the applicable solvent cleaning activities to ensure that compliance with Rule 74.6 is being maintained. Upon request of the District, compliance with Rule 74.6 shall be determined using the following methods:

a. Pursuant to Rule 74.6.E.1, the ROC content of materials shall be determined by EPA Test Method 24 or 24A.

b. Pursuant to Rule 74.6.E.4, the identity of components in solvents shall be determined using manufacturer's formulation data or by using ASTM E168-67, ASTM E169-87, or ASTM E260-85.

c. Pursuant to Rule 74.6.E.5, ROC composite partial pressure of a solvent shall be calculated using a widely accepted published source such as: Boublik, T., V. Fried and E. Hala, "The Vapor Pressure of Pure Substances," Elsevier Scientific Publishing Co., New York (1973), Perry's Chemical Engineers Handbook, McGraw-Hill Book Company, CRC Handbook of Chemistry and Physics, Chemical Rubber Publishing Company (1986-1987), and Lange's Handbook of Chemistry, John A. Dean, editor, McGraw-Hill Book Company (1985). The true vapor pressure of a component in a solvent mix may be determined by ASTM Method D2879-86. The ROC composite partial pressure of a solvent mix consisting entirely of ROC may be determined by ASTM Method D2879-86.

d. Pursuant to Rule 74.6.E.6, initial boiling point of solvent shall be determined by ASTM 1078-78 or by using a published source such as listed in Rule 74.6.E.5.

e. Pursuant to Rule 74.6.E.7, the active and passive solvent losses from spray gun cleaning systems shall be determined using South Coast Air Quality Management District's "General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems" dated October 3, 1989. The test solvent for this determination shall be any lacquer thinner with a

minimum vapor pressure of 105 mm Hg at 20°C. The minimum test temperature shall be 15°C.

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Ventura County Air Pollution Control District
Rule 74.10 Applicable Requirements
Components at Crude Oil and Natural Gas Production and Processing Facilities

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"
Adopted 6/16/92, Federally-Enforceable

Applicability:

This attachment applies to the crude oil and natural gas production and processing facilities, and to natural gas processing plants, at this stationary source. This attachment summarizes the fugitive leak and leak inspection requirements of Rule 74.10, except for those requirements specified under Rule 74.10.B.3. Rule 74.10.B.3 requirements, which are covered in a separate attachment, only apply to natural gas processing plants, except for those plants that are less than 10 million standard cubic feet per day capacity and do not fractionate natural gas liquids.

A crude oil production and processing facility is any facility where crude oil production and processing are conducted as defined in the Standard Industrial Classification Code 1311. A natural gas processing plant is defined as a facility engaged in the separation of natural gas liquids from field gas and/or fractionation of the liquids into natural gas products such as ethane, propane, butane, and natural gasoline. Excluded from the definition of natural gas processing plant are compressor stations, dehydration units, sweetening units, field treatment, underground storage facilities, liquefied natural gas units, and field gas gathering systems unless these facilities are located at a natural gas processing plant. This attachment does not apply to petroleum refineries.

Conditions:

1. Pursuant to Rule 74.10.B.1, hatches shall be closed at all times except during sampling or attended maintenance operations.

2. Pursuant to Rule 74.10.B.2, no person shall use a component at a crude oil or natural gas production facility, or a natural gas processing plant, if such component leaks (as defined in Rule 74.10.J.9) reactive organic compounds when the applicable maximum leak threshold for that component category as listed in Attachment 1 of Rule 74.10 has been exceeded at the facility after the applicable effective date in any calendar quarter. Rule 74.10.B.2 shall not apply to components that are tagged and repaired in accordance with Rule 74.10.C and 74.10.E.

3. Pursuant to Rule 74.10.C.1, permittee shall visually inspect pumps, including but not limited to rod pumps and compressor pumps, not less than weekly for liquid leaks.

4. Pursuant to Rule 74.10.C.2, permittee shall monitor the following components at least every quarter for gaseous leaks in accordance with EPA Reference Method 21. All other components not listed below, except flanges designated in the Operator Management Plan as exempt from inspection requirements, shall be monitored at least annually in accordance with EPA Reference Method 21:

    a. Valves
    b. Packing seals on dump lever arms connected to gas traps, separators, or vessels
    c. Hatches on non vapor recovery tanks
    d. Polished rod stuffing boxes
    e. At natural gas processing plants: compressor seals, pressure relief devices, and pumps

    As detailed in Rule 74.10.C.4, permittee may qualify for annual, rather than quarterly, monitoring of specified components by achieving a good performance level for five consecutive quarters and submitting a written request to the District Enforcement Section. A reduction in monitoring frequency will not become effective until written approval by the District is received by the permittee. Pursuant to Rule 74.10.C.5, quarterly monitoring shall be reinstated by the permittee during the next calendar quarter upon failure to achieve a good performance level.

5. In addition to the weekly and quarterly monitoring required above, permittee shall perform routine surveillance of the applicable components to ensure that compliance with Rule 74.10 is being maintained. This routine surveillance shall include verifying that proper operation and equipment and inspection requirements are being met.

6. Pursuant to Rule 74.10.C.3, upon detection, permittee shall affix a readily visible tag to all leaking components with the date that leaks are detected. The tag shall remain affixed until the component is repaired free of leaks as shown by re-inspection.

7. Pursuant to Rule 74.10.D, permittee shall submit an Operator Management Plan to the District Enforcement Section for approval. No provision in the Operator Management Plan, approved or not, shall conflict with or take precedence over

any provision of Rule 74.10. The Operator Management Plan shall identify any component exempt from Rule 74.10 (as detailed in Rule 74.10.F) or part of Rule 74.10, and describe the procedures that the permittee intends to use to comply with the requirements of Rule 74.10. The Operator Management Plan must identify all components detailed in Rule 74.10.D.1.

Permittee shall submit a new or modified Operator Management Plan to the District Enforcement Section for approval for a modification to this facility covered under an existing plan.

Permittee shall be required, upon written request by the District, to re-qualify, by analysis, any exemption(s) from Rule 74.10 or part of Rule 74.10 if the exemption(s) may no longer be valid based on the changed composition of the process stream. The results of that analysis and any modification to the Operator Management Plan shall be submitted to the District Enforcement Section within 90 days after receipt of the District request.

If the exempt status of a component is affected by a revision to this rule, then the Operator Management Plan shall be modified accordingly. The modification to the Operator Management Plan shall be submitted to the District Enforcement Section no later than 90 days after adoption of the rule revision.

8. Pursuant to Rule 74.10.E, any component found leaking shall be repaired to a leak free condition as soon as practicable but no later than 21 days from the detection date. Any component found leaking at a natural gas processing facility shall be repaired to a leak free condition no later than 15 days from the detection date.

   A leaking component which is an essential part of a critical process unit identified in an approved Operator Management Plan must be repaired during the next scheduled shutdown or process turnaround of the unit, but not later than three (3) months from the date of detection.

   Permittee shall re-inspect components for leaks as soon as practicable, but not later than one week after the date on which the component is repaired.

   Any component leak identified by the District shall be repaired and inspected according to the timeframes required above by this condition.

9. Pursuant to Rule 74.10.H, the following test methods shall be used to demonstrate compliance with Rule 74.10 or to qualify for an exemption from Rule 74.10:

a. Pursuant to Rule 74.10.H.1, gaseous leaks from components shall be determined by EPA Method 21 by using an appropriate analyzer calibrated with methane. The calibration maintenance, and operation of the appropriate analyzer shall follow the manufacturer's recommendations.

b. Pursuant to Rule 74.10.H.2, the ROC concentration, by weight, of gaseous process streams shall be measured by ASTM E168-67 (General Techniques of Infrared Qualitative Analysis), ASTM E169-63 (General Techniques of Ultraviolet Quantitative Analysis), or ASTM E260-73 (Gas Chromatography), or updated versions of these methods approved by EPA and published in the 40 CFR Part 60.

c. Pursuant to Rule 74.10.H.3, the ROC concentration, by weight, of liquid process streams not at natural gas processing plants, shall be measured using ASTM Method D96 (Water Cut and Sediment). The ROC concentration of the liquid shall be the material remaining after separating the water and sediment.

d. Pursuant to Rule 74.10.H.4, the API gravity of crude oil shall be determined using ASTM Method D287.

10. Pursuant to Rule 74.10.G, permittee shall maintain an inspection log containing, at a minimum, the following:

a. The location, type, description of each leaking component inspected, and name of any operating unit where each leaking component is found
b. Date of leak detection and method of detection
c. Date that leak is repaired to a leak free condition, and date of re-check
d. Identification of leaks from critical process units
e. Number of components inspected, number and percentage of leaking components found, categorized by the following groups:

    1. Hatches
    2. Polished rod stuffing boxes
    3. Dump lever arms
    4. Valves (not open ended)
    5. Open ended lines
    6. Flanges (if designated in Operator Management Plan as exempt from inspection requirements)
    7. Other components

This information shall be submitted to the District upon request.

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10. GENERAL REQUIREMENTS FOR SHORT-TERM ACTIVITIES (ATTACHMENTS)

The general requirements for short-term activities are broadly applicable requirements that apply to temporary activities at the facility (e.g., abrasive blasting, architectural coatings, degassing operations, etc.). These are activities occurring infrequently and for a short duration. Requirements for short-term activities can normally be adequately addressed in the permit application with minimal or no reference to any specific emissions unit, provided that the scope of the requirement and the manner of its enforcement are clear.

As detailed in the Title V Permit Application General Applicable Requirements Form, Form TV AF25, general applicable requirements for short-term activities that apply to this facility were determined. The permit conditions associated with each requirement for a short-term activity are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No.) ____" or "Attachment 40CFR61.M" in the lower left corner of each attachment.

Ventura County Air Pollution Control District
Rule 74.1 Applicable Requirements
Abrasive Blasting

Rule 74.1, "Abrasive Blasting"
Federally-Enforceable OCS Version Adopted 11/12/91
District-Enforceable Version Adopted 11/12/91

The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to short term activities involving any abrasive blasting operation conducted at this facility. Abrasive blasting is the operation of cleaning or preparing a surface by forcibly propelling a stream of abrasive material against that surface. Abrasive materials subject to Rule 74.1 include, but are not limited to, sand, slag, steel shot, garnet or walnut shells.

Conditions:

1. Pursuant to Rule 74.1.B.1.a, all abrasive blasting operations shall be conducted within a permanent building, except for abrasive blasting operations conducted under one or more of the following conditions as detailed in Rule 74.1.B.1.b:

    a. Steel or iron shot/grit is used exclusively

    b. The item to be blasted exceeds eight feet in any dimension

    c. The surface being blasted is situated at its permanent location or no further away from its permanent location than is necessary to allow the surface to be blasted

2. Pursuant to Rule 74.1.B.1.c, any abrasive blasting that is allowed to be conducted outside of a permanent building, and is not exclusively using steel or iron shot/grit, must use one of the following:

    a. Wet abrasive blasting

    b. Hydroblasting

c. Vacuum blasting

d. Dry blasting with California ARB certified abrasives

3. Abrasive blasting for pavement marking shall comply with the requirements of Rule 74.1.B.2.

4. Abrasive blasting of stucco and concrete shall comply with the requirements of Rule 74.1.B.3.

5. Packages or containers for abrasives certified in accordance with Section 92530 of the California Code of Regulations used for permissible outdoor blasting shall comply with the labeling requirements of Rule 74.1.B.4.

6. Abrasive blasting operations shall comply with the visible emission standards of Rule 74.1.C.1 and the nuisance prohibition of Rule 74.1.C.2. The visible emission evaluation of abrasive blasting operations shall be conducted in accordance with Section 92400 of the California Code of Regulations.

7. Permittee shall perform routine surveillance and visual inspections of the abrasive blasting operation to ensure that compliance with Rule 74.1 is being maintained. This routine surveillance shall include assuring that operation and equipment requirements are being met, and that there are no opacity violations.

   In addition, for each abrasive blasting operation conducted at the facility, permittee shall maintain records of the following information:

   a. Date of operation

   b. Type of abrasive blasting media used

   c. Identity, size, and location of item blasted

   d. Whether operation was conducted inside or outside a permanent building

   e. California ARB certifications for abrasives used

   These records shall be maintained at the facility and submitted to the District upon request.

Ventura County Air Pollution Control District
Rule 74.2 Applicable Requirements
Architectural Coatings

Rule 74.2, "Architectural Coatings"
Federally-Enforceable Version Adopted 11/22/83
Federally-Enforceable OCS Version Adopted 8/11/92
District-Enforceable Version Adopted 8/11/92

The District-enforceable version of this rule has been determined by EPA to be more stringent than the current SIP version of the rule and therefore compliance with the conditions listed below for the 8/11/92 version of the rule will ensure compliance with the current federally-enforceable requirements for all subject sources. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to short term activities involving any person who supplies, sells, offers for sale, applies or solicits the application of any architectural coating at this stationary source. Architectural coatings are coatings applied to stationary structures and their appurtenances, to mobile homes, to pavements, or to curbs.

Conditions:

1. Pursuant to Rule 74.2.B.1, the volatile organic compound (VOC) content of general architectural coatings, except specialty coatings shall not exceed 250 grams per liter of coating excluding water, exempt organic compounds and any colorant added to tint bases, unless specifically exempted by Rule 74.2.

2. Pursuant to Rule 74.2.B.3, the VOC content of specialty architectural coatings shall not exceed the VOC limits in the Table of Standards in Rule 74.2, unless specifically exempted by Rule 74.2.

3. Pursuant to Rule 74.2.B.6, the VOC content of lacquers shall not exceed 680 grams per liter of coating as applied, excluding water; the VOC content of industrial maintenance primers and topcoats shall not exceed 420 grams per liter of coating as applied, excluding water; and the VOC content of quick-dry enamels shall not exceed 400 grams per liter of coating as applied, excluding water.

4. Pursuant to Rule 74.2.B.7, all VOC-containing materials shall be stored in closed containers when not in use.

5. Permittee shall perform routine surveillance of the architectural coating operation to ensure that compliance with Rule 74.2 is being maintained. Permittee shall specify the usage of compliant coatings and shall maintain VOC records of coatings used at the stationary source. This information shall be submitted to the District upon request.

6. Pursuant to Rule 74.2.E, the VOC content of architectural coatings shall be measured using EPA Method 24, the VOC content from exempt organic compounds shall be measured using CARB Method 432, the acid content of pre-treatment wash primers shall be measured using ASTM Method D 1613-85 (modified), and the metal content of metallic pigmented coatings shall be measured using SCAQMD Method 311-91.

Ventura County Air Pollution Control District
Rule 74.4.D Applicable Requirements
Cutback Asphalt - Road Oils

Rule 74.4, "Cutback Asphalt"
Adopted 7/5/83, Federally-Enforceable

Applicability:

This attachment applies to short term activities involving the application of road oils for road, highway or street paving and maintenance. For the purpose of Rule 74.4, road oil shall be synonymous with slow cure asphalt.

Conditions:

1. Pursuant to Rule 74.4.D, road oils used for highway or street paving or maintenance applications shall contain no more than 0.5 percent of organic compounds which boil at less than 500^{o}F as determined by ASTM D402.

2. Permittee shall sample and test oil being proposed for usage in order to ensure that compliance with Rule 74.4.D is being maintained. Permittee shall maintain records of oil analyses at the facility and submit these records to the District upon request.

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Ventura County Air Pollution Control District
Rule 74.16 Applicable Requirements
Oilfield Drilling Operations

Rule 74.16, "Oilfield Drilling Operations"
Federally-Enforceable OCS Version Adopted 1/8/91
District-Enforceable Version Adopted 1/8/91

The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to short term activities involving all oilfield drilling operations. Oilfield drilling operations are defined as activities powered by nonvehicular internal combustion engines for the purpose of drilling or redrilling oil wells, injection wells, or gas wells. For the purpose of Rule 74.16, drilling operations do not include any operations at any existing well where the derrick is a part of an oilwell production service unit, as defined in the California Vehicle Code. Rule 74.16 applies to drill rig engines over 50 HP including, but not limited to, engines supplying power to drawworks, rotary tables, mud pumps, mud mixers and auxiliary generators.

This attachment applies to an oil company, which Rule 74.16 defines as the person contracting the drilling rig and/or the person who applies for an Authority to Construct for the well. The APCD issues portable Permits to Operate to the owners of drilling rigs.

This permit does not authorize the operation of any non-vehicular engine of 50 BHP, or greater, for well drilling or workover operations. Prior to using such an engine, the engine owner shall obtain a Permit to Operate for the engine.

Conditions:

1. Pursuant to Rule 74.16.B.1, all drilling operations shall be powered by grid power, unless exempted by Rule 74.16.C.1. Grid power is defined as electricity conveyed by power lines connected physically and contractually to the Southern California Edison System, or any electricity generated by equipment permitted by the District and having permitted emissions commensurate with an emissions rate of not more than 1.0 pound of NO_x per megawatt-hour of electricity produced.

2. Pursuant to Rule 74.16.C.1, an oil company may petition the Air Pollution Control Officer for exemption from Rule 74.16.B.1 by submitting a cost evaluation for grid

powered drilling. Best Available Control Technology cost guidelines shall be used to determine cost effectiveness. As detailed in APCD Rule 44, "Exemption Evaluation Fee", Rule 44.B.2 requires that any person requesting an exemption from Rule 74.16 that is based on a cost evaluation shall be assessed an evaluation fee of $450.00.

3. Pursuant to Rule 74.16.B.2.a, if a drilling operation is exempt from Rule 74.16.B.1, NOx emissions from drilling engines, or any exhaust stack of multiple engines permanently manifolded together, shall not exceed 515 ppmv corrected to 15% oxygen. As an alternate, pursuant to Rule 74.16.B.2.c, drilling engines certified by the manufacturer to emit 6.9 grams of NOx per brake horsepower-hour or less based on a California ARB approved heavy duty offroad engine testing procedure shall be deemed in compliance with Rule 74.16.B.2.a, and shall not be subject to the annual source test requirements in Rule 74.16.B.2.b.

   In order to comply with this condition, permittee shall ensure that the drilling rig utilized has a valid APCD Permit to Operate and that the drilling rig has demonstrated compliance with Rule 74.16.B.2.a in accordance with CARB Method 100 as detailed in Rule 74.16.E (Test Methods), or has demonstrated compliance with Rule 74.16.B.2.c.

4. In order to demonstrate compliance with Rule 74.16.B.2.a, the drilling rig company shall perform source testing on the drilling engine exhaust annually. Permittee shall obtain from the drilling rig company the most recent source test results for the exempt engines subject to Rule 74.16.B.2.a, or the engine manufacturer certification for exempt engines subject to Rule 74.16.B.2.c. This information shall be made available on site and submitted to the District upon request.

5. Upon District request, the NO_x emissions from the drilling engine exhaust shall be measured using CARB Method 100, in accordance with Rule 74.16.E (Test Methods).

6. In order to demonstrate compliance with Rule 74.16.C.1, permittee shall maintain documentation on the cost analysis as verification to the grid power exemption. This documentation shall be submitted to the District upon request.

Ventura County Air Pollution Control District
Rule 74.26 Applicable Requirements
Crude Oil Storage Tank Degassing Operations

Rule 74.26, "Crude Oil Storage Tank Degassing Operations"
Adopted 11/8/94, Federally-Enforceable

Applicability:

This attachment applies to short term activities involving degassing of any aboveground crude oil or produced water storage tank that is equipped with a vapor recovery system and has a storage capacity greater than 2,000 barrels; or has a storage capacity of 2,000 barrels and stores a liquid having a modified Reid vapor pressure (mRVP) of 3.4 pounds per square inch (psi) absolute or greater. This attachment also applies to any external or internal floating roof crude oil tank that has a vapor space of 2,000 barrels or more when the tank's roof is resting on the tank's inner roof supports. Rule 74.26 does not apply to vessels rated and operated to contain normal working pressure of at least 15 psi gauge without vapor loss to the atmosphere.

Degassing is defined as the removal of organic vapors from a stationary storage tank for the purpose of cleaning, removing the tank, cleaning the tank's interior, or making repairs to the tank that would require the complete removal of product from the tank.

This permit does not authorize the operation of any air pollution control device for tank degassing operations. This includes, but is not limited to, a thermal or catalytic incinerator, a carbon adsorber, a condenser, or an internal combustion engine. Prior to using such a device, the owner of the air pollution control device shall obtain a Permit to Operate for the device.

Conditions:

1. Pursuant to Rule 74.26.B.1, no person shall conduct or allow the degassing of any storage tank subject to Rule 74.26, unless the emissions are controlled by one of the following options:

    a. Liquid displacement into a vapor recovery system, flare, or fuel gas system (Rule 74.26.B.1.a). Liquid displacement is defined as the removal of ROC vapors from within a storage tank drained of liquid product by introducing into the tank a liquid having an ROC modified Reid vapor pressure (mRVP) of less than 0.5 psi absolute until at least 90 percent of the tank’s vapor volume has been displaced, with the mRVP determined using ASTM

Method D 323-82 conducted at 68 degrees Fahrenheit (Rule 74.26.F.10). or

b. An air pollution control device that has a vapor destruction and removal efficiency of at least 95 percent until the vapor concentration in (Rule 74.26.B.1.b):

1. Aboveground crude oil or produced water tanks equipped with a vapor recovery system, is less than 10 percent of the tank's initial vapor concentration determined immediately prior to the tank degassing, or less than 10,000 ppmv, measured as methane, or

2. Floating roof tanks, is less than 10,000 ppmv, measured as methane.

Fugitive emissions that do not qualify as a leak shall be allowed around tank openings such as a manhole during a tank degassing operation performed in compliance with Rule 74.26.

Pursuant to Rule 74.26.E.3, compliance with the above limits shall require that the tank vapor concentration remain at or below 10,000 ppmv for at least one hour as demonstrated by measuring the vapor concentration at least four times at 15-minute intervals. The monitoring instrument used to measure the vapor concentration shall meet the specifications of EPA Method 21.

2. Pursuant to Rule 74.26.B.2, any receiving vessel used during a tank cleaning operation shall either be bottom loaded or shall be loaded by submerged fill pipe. Any vapors emitted from such vessels during a tank degassing operation shall be controlled with an air pollution control device as required by Rule 74.26.B.1.b. As defined in Rule 74.26.F.14, a receiving vessel is a vessel used to receive liquids or sludge material removed from an ROC liquid storage tank during a tank degassing operation.

3. Pursuant to Rule 74.26.B.3, except during an emergency, the District Enforcement Section shall be notified verbally or in writing at least 48 hours prior to starting any tank degassing operation. Such notification shall include an identification of the tank(s) to be degassed and the air pollution control method employed. If a tank degassing operation was required due to an emergency, the District Enforcement Section shall be notified as soon as reasonably possible but no later than four hours after completion of the operation. An emergency is defined as an unplanned and

unexpected event that, if not immediately attended to, presents a safety or public health hazard or an unreasonable financial burden.

4. In order to demonstrate compliance for air pollution control devices used to comply with Rule 74.26.B, operator shall record:

   a. The vapor concentration in parts per million (ppm) and gas flow rate in cubic feet per minute (cfm) entering and exiting the device (except for a flare) upon beginning use of the device and every thirty minutes thereafter. The instrument used to measure vapor concentration shall meet the specifications of EPA Method 21, and

   b. The tank's vapor concentrations determined in accordance with Rule 74.26.E.3, and

   c. If a refrigerated condenser is used, permittee shall record the condenser temperature in degrees Fahrenheit upon beginning use of the condenser and every thirty minutes thereafter. These records shall be maintained and shall be submitted to the District upon request.

   In addition, permittee shall perform routine surveillance of the tank degassing operation to ensure that the equipment is properly operating.

5. Pursuant to Rule 74.26.D.3, any person claiming an exemption for a storage tank based on mRVP shall provide records that demonstrate that the liquid stored in the tank has a mRVP less than 3.4 psi absolute, as determined by ASTM Method D 323-82.

6. Pursuant to Rule 74.26.E.2, methods for determining vapor destruction or removal efficiency include vapor flow through the pipes, measured using EPA Method 2A; and the vapor concentration entering and exiting the device, measured using EPA Method 25A. This testing shall be performed upon District request.

7. Pursuant to Rule 74.26.E.3, the monitoring instrument used to measure the tank vapor concentration specified in Subsection B.1.b shall meet the specifications of EPA Method 21 and shall contain a probe inlet located one foot above the bottom of the tank or one foot above the surface of any sludge material on the bottom of the tank. For upright, cylindrical aboveground tanks, the probe inlet shall be (1) located at least 2 feet away from the inner surface of the tank wall and (2) if samples are withdrawn from a manhole, inserted in an opening of no more than one inch diameter on a flexible or inflexible material that is impermeable to reactive organic compound (ROC) vapors, secured over the manhole.

8. In order to comply with the above conditions, permittee shall insure that any tank degassing subcontractor utilized has a valid APCD Permit to Operate for portable tank degassing emission control equipment and that the control equipment complies with Rule 74.26, in accordance with Rule 74.26.E (Test Methods) when necessary.

9. Pursuant to Rule 74.26.C.2, the provisions of Section B of Rule 74.26 shall not apply to in-service tanks undergoing maintenance, including but not limited to repair of regulators, fittings, deck components, hatches, valves, flame arrestors, or compressors, or any leaks found pursuant to the operator inspection requirements in Rule 74.10, provided that (1) the operation will take no longer than 24 hours to complete and (2) the maintenance operation does not require the complete draining of product from the tank.

Ventura County Air Pollution Control District
Rule 74.29 Applicable Requirements
Soil Decontamination Operations

Rule 74.29, "Soil Decontamination Operations"
Adopted 10/10/95, District-Enforceable

This rule will become federally enforceable when approved by EPA as part of the SIP.

Applicability:

This attachment applies to short term activities involving soils that contain gasoline, diesel fuel, or jet fuel. Rule 74.29 does not apply to soil that contains only crude oil or was contaminated by a leaking storage tank used in an agricultural operation engaged in the growing of crops or the raising of fowl or animals.

Specifically, this attachment applies to the aeration of soil that contains gasoline, diesel fuel, or jet fuel. Aeration is defined as the exposure of excavated soil, containing diesel fuel, gasoline, or jet fuel, to the atmosphere without the use of air pollution control equipment or vapor extraction equipment.

Remediation equipment for contaminated soil requires an APCD permit. Rule 74.29 requirements for such remediation equipment would be addressed in another permit attachment, if applicable. As detailed in APCD Rule 23.F.23, any soil aeration project exempt from the soil aeration limit in Rule 74.29 pursuant to Subsection C.1, C.2, or C.3 of Rule 74.29 is exempt from the requirement to obtain a permit for the soil aeration project. Also, pursuant to APCD Rule 23.F.24, any soil remediation project where collected vapors are not emitted to the atmosphere by any means is exempt from the requirement to obtain a permit.

Conditions:

1. Pursuant to Rule 74.29.B.1.a, no person shall cause or allow the aeration of soil that contains gasoline, diesel fuel, or jet fuel if such aeration emits organic vapors sufficient to cause a calibrated organic vapor analyzer meeting the specifications of EPA Method 21 to register 50 parts per million by volume (ppmv) above background, as hexane, or more, except nonrepeatable momentary readings, as determined by the method specified in Rule 74.29.F.5.

2. Pursuant to Rule 74.29.B.1.b, no person shall cause or allow the aeration of soil that contains gasoline, diesel fuel, or jet fuel if such aeration causes a nuisance, as

defined in the California Health and Safety Code Section 41700 and APCD Rule 51, "Nuisance".

3. Pursuant to Rule 74.29.B.3, no person shall operate an in-situ soil bioventing or bioremediation system that emits fugitive gasses to the atmosphere if such gasses contain organic compounds sufficient to cause a calibrated organic vapor analyzer meeting the specifications of EPA Method 21 to register 50 ppmv above background, as hexane, or more, except nonrepeatable momentary readings, when measured at a distance of three inches from the soil surface.

   For each soil decontamination operation where in-situ soil bioventing or bioremediation occurs, permittee shall determine compliance with Rule 74.29.B.3 on a weekly basis as detailed above. A dated record of these measurements shall be maintained at the facility and submitted to the District upon request.

4. Pursuant to Rule 74.29.B.4, the owner or operator of any underground gasoline storage tank shall notify the District Enforcement Section at least 24 hours prior to the beginning the excavation of the said storage tank.

5. Pursuant to Rule 74.29.C.2, Rule 74.29.B.1.a shall not apply to any soil aeration project where the owner or operator demonstrates to the satisfaction of the District that the following two requirements are met:

   a. The project is not located within 1,000 feet of the outer boundary of a school, and

   b. The project will result in the emissions of less than 200 pounds of reactive organic compounds (ROC) per rolling twelve month period as determined in accordance with Rule 74.29.F.1 and 74.29.F.2.

   As detailed in APCD Rule 44, "Exemption Evaluation Fee", Rule 44.B.4 requires that any person requesting an exemption from the soil aeration requirements pursuant to Rule 74.29.C.2, that is based on the amount of ROC emissions, shall be assessed an evaluation fee of $250.00. The exemption request shall be submitted to the District Engineering Section.

6. Pursuant to Rule 74.29.C.3, the soil aeration requirements of Rule 74.29.B.1.a shall not apply to:

   a. Soil excavation activities necessary for the removal of in-situ soil such as in the removal of an underground storage tank, pipe or piping system,

provided the exposed soil is properly covered within one hour of terminating the activity; or

b. Soil moving, loading, or transport activities performed for the sole purpose of complying with local, state, or federal laws, provided the soil is properly handled in accordance with such laws; or

c. Soil excavation or handling occurring as a result of an emergency as declared by an authorized health officer, agricultural commissioner, fire protection officer, or other authorized agency officer. Whenever possible, the District Enforcement Section shall be notified prior to commencing such excavation; or

d. Any soil aeration project involving less than 10 cubic yards of contaminated soil, provided the soil contains less than 0.8 percent by weight contaminant, as analyzed in accordance with Rule 74.29.F.2; or

e. Soil contamination which resulted from a spill or release of less than one barrel of diesel fuel, jet fuel, or gasoline; or

f. Contaminated soil used as an alternative daily cover, as defined by Rule 74.29.G.2, at permitted Class III Solid Waste Disposal Sites.

7. Pursuant to Rule 74.29.F.5, in order to determine compliance with the aeration limit of Rule 74.29.B.1.a, a portion of soil measuring three inches in depth and no less than six inches in diameter shall be removed from the soil surface and the probe inlet shall be placed near the center of the resulting hole, level with the soil surface surrounding the hole.

   For each soil decontamination operation where soil aeration occurs, permittee shall determine compliance with Rule 74.29.B.1.a on a weekly basis as detailed above. A dated record of these measurements shall be maintained at the facility and submitted to the District upon request.

8. Pursuant to Rule 74.29.F.1 and 74.29.F.2, in order to determine compliance with the ROC emission limit of Rule 74.29.C.2.b, the aeration project emissions shall be determined by the calculation in Rule 74.29.F.1, and the weight percent of contaminant in soil samples shall be determined by EPA Method 8015B per Rule 74.29.F.2.

   For each soil decontamination operation where soil aeration occurs, permittee shall determine compliance with Rule 74.29.C.2.b as detailed above. A dated record of

these calculations and measurements shall be maintained at the facility and submitted to the District upon request.

9. Pursuant to Rule 74.29.D, permittee shall record each date soil was aerated and the quantity of soil aerated on each date for any soil aeration project subject to Rule 74.29. These records shall be maintained at the facility and submitted to the District upon request.

10. Permittee shall perform routine surveillance of the soil aeration operation or the underground gasoline storage tank excavation operation to ensure that compliance with Rule 74.29.B.1, 74.29.B.3, and Rule 74.29.B.4 is being maintained. This routine surveillance shall include assuring that proper operation requirements are being met.

11. GENERAL PERMIT CONDITIONS

This section contains general Part 70 permit conditions and general APCD permit to operate conditions. The general Part 70 permit conditions are associated with general federal requirements that apply to all Title V facilities. These conditions are based on APCD Rules 8, 30, 32, and 33, and 40 CFR Part 70.

The general permit to operate conditions are associated with general District requirements that apply to all operating Title V facilities. These conditions are based on APCD Rules 19, 20, 22, and 27.

Ventura County Air Pollution Control District
General Part 70 Permit Conditions

1. The permittee shall comply with all federally-enforceable conditions of the Part 70 permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of an application for reissuance of the permit. (40 CFR 70.6(a)(6)(i), APCD Rule 33.3.A.6)

2. The permittee shall continue to comply with all the applicable requirements with which the company has certified that it is already in compliance. The permittee shall comply in a timely manner with applicable requirements that become effective during the permit term of this permit.

3. The permittee shall promptly report deviations from Part 70 permit requirements, including those attributable to upset conditions as defined in the Part 70 permit, the probable cause of the deviations, and any corrective actions or preventive measures taken. Promptly is defined as no later than four (4) hours after its detection by such owner or operator, or his agents or employees. (40 CFR 70.6(a)(3)(iii)(B), APCD Rule 33.3.A.3, APCD Rule 32.B.1)

4. The need to halt or reduce activity is not a defense. It shall not be a defense for a permittee in an enforcement action that it would be necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Part 70 permit. (40 CFR 70.6(a)(6)(ii), APCD Rule 33.3.A.7)

5. The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 permit. All applicable reports shall be submitted to the District every 6 months and shall be certified by a responsible official. (40 CFR 70.6(a)(3)(ii)(B), 40 CFR 70.6(a)(3)(iii)(A), APCD Rule 33.3.A.3)

6. The permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 permit or to determine compliance with the Part 70 permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the Part

70 permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of the EPA along with a claim of confidentiality. (40 CFR 70.6(a)(6)(v), APCD Rule 33.3.A.10)

7. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the District or an authorized representative to perform the following:

   a. Enter upon the permittee's premises where a Part 70 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the Part 70 permit;

   b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the Part 70 permit;

   c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the Part 70 permit; and

   d. As authorized by the federal Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the Part 70 permit or applicable requirements.

   (40 CFR 70.6(c)(2), APCD Rule 8, APCD Rule 33.3.B.1)

8. The Part 70 permit may be modified, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (40 CFR 70.6(a)(6)(iii), APCD Rule 33.3.A.8)

9. A Part 70 permit shall be reopened under the following conditions:

   a. Additional applicable requirements under the federal Clean Air Act become applicable to the facility with a remaining Part 70 permit term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the Part 70 permit is due to expire, unless the original Part 70 permit or any of its terms and conditions has been extended pursuant to APCD Rule 33.6.D;

b. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator of the EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 permit;

c. The District or EPA determines that the Part 70 permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 permit; or

d. The Administrator of the EPA or the District determines that the Part 70 permit must be revised or revoked to assure compliance with the applicable requirements.

(40 CFR 70.7(f), APCD Rule 33.8.A)

10. All fees required by District Regulation III, Fees, shall be paid on a timely basis as requested by the District. Notwithstanding the term of the Part 70 permit, if the permittee fails to pay the annual renewal fees required pursuant to APCD Rule 42.H within the time period specified in APCD Rule 30, the Part 70 permit will be void. (40 CFR 70.6(a)(7), APCD Rule 30, APCD Rule 33.3.A.11)

11. The Part 70 permit does not convey any property rights of any sort, or any exclusive privilege. (40 CFR 70.6(a)(6)(iv), APCD Rule 33.3.A.9)

12. If any term or condition of this Part 70 permit shall for any reason be adjudged by a court of competent jurisdiction to be unconstitutional or invalid, such judgment shall not effect or invalidate the remainder of this Part 70 permit, but shall be confined in its operation to the term or condition directly involved in the controversy in which such judgment shall have been rendered. It is hereby declared to be the intent of the District, that this Part 70 permit would have been issued and enforced in any case had such invalid term or condition not been included. (40 CFR 70.6(a)(5), APCD Rule 33.3.A.5)

13. An application for reissuance of this Part 70 Permit shall be submitted no more than 18 months prior to the expiration date and no less than 6 months prior to the expiration date as stated on this permit. The application shall be subject to the same procedural requirements, including those for public participation and EPA review, that apply to initial Part 70 permit issuance. (40 CFR 70.5(a)(1)(iii), 40 CFR 70.7(c)(1)(i), APCD Rule 33.6.B)

14. Any Part 70 application and any document, including reports, schedule of compliance progress reports, and compliance certification, required by this Part 70

permit shall be certified by a responsible official. The certification shall state that, based on information and belief formed after a reasonable inquiry, the statements and information in the document are true, accurate, and complete (40 CFR 70.6(c)(5), APCD Rule 33.9.D)

15. Permittee shall submit a certification of compliance with all applicable requirements and all Part 70 permit conditions. A compliance certification shall be submitted with any Part 70 permit application and annually, on the date of the anniversary date of the Part 70 permit, or on a more frequent schedule if required by an applicable requirement or permit condition.

    This compliance certification shall identify each applicable requirement or condition of the Part 70 permit, the compliance status of the stationary source, whether the compliance was continuous or intermittent since the last certification, the method(s) used to determine compliance. In addition, the certification shall indicate the stationary source's compliance status with any applicable enhanced monitoring and compliance certification requirement of the federal Clean Air Act. A copy of each compliance certification shall be submitted to EPA Region IX. (40 CFR 70.6(c)(5), APCD Rule 33.3.B.3, APCD Rule 33.9.C)

Ventura County Air Pollution Control District
General Permit to Operate Conditions

1. Within 10 days after receipt of a permit to operate, the permittee may petition the Hearing Board, in writing, to review any new or modified condition on the permit. (APCD Rule 22)

2. This permit to operate, or a copy, shall be posted reasonably close to the subject equipment and shall be readily accessible to inspection personnel from the District. Posting a copy of the "Permitted Equipment and Applicable Requirements Table" contained in Section No. 2 will fulfill this requirement if the entire permit to operate is readily available at another location at the stationary source. (APCD Rule 19)

3. This permit to operate is not transferable from one location to another unless the equipment is specifically listed as being portable. (APCD Rule 20)

4. If, within a reasonable amount of time, any permittee refuses to furnish information requested by the District, the District may suspend this permit to operate The permittee will be informed, in writing, of the permit suspension and the reasons for the suspension. (APCD Rule 27)

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Ventura County Air Pollution Control District
Permit Shield - New Source Performance Standards
Tenby Inc.

40 CFR Part 60, Subpart J, "Standards of Performance for Petroleum Refineries"

40 CFR Part 60, Subpart UU, "Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture"

40 CFR Part 60, Subpart GGG, "Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries"

40 CFR Part 60, Subpart QQQ, "Standards of Performance for VOC Emissions From Petroleum Refinery Wastewater Systems"

Permit Shield:

The New Source Performance Standards listed above have been reviewed and it has been determined that they are not applicable to this stationary source. Subpart J, Subpart GGG, and Subpart QQQ apply to affected facilities located at petroleum refineries. Subpart UU applies to affected facilities at asphalt processing plants, petroleum refineries, and asphalt roofing plants. This stationary source is not a petroleum refinery, asphalt roofing plant, or asphalt processing plant as defined in these New Source Performance Standards, and therefore these standards do not apply to this stationary source.

This stationary source is primarily a crude oil production facility. Steam and petroleum diluent are injected into heavy crude oil wells. The wells then produce a mixture of heavy crude oil, natural gas, diluent, and water. The mixture is initially separated by gravity, aided by heat. In order to recover the diluent, final separation is done in an atmospheric distillation tower.

The heavy crude oil is then sold as various grades of asphalt, and the diluent is recycled back into the oil wells. To balance the process on a seasonal basis, diluent is sold or purchased as necessary.

Ventura County Air Pollution Control District
Permit Shield - New Source Performance Standards
Tenby Inc.

40 CFR Part 60, Subpart Dc, "Standards of Performance for Small Industrial - Commercial - Institutional Steam Generating Units"

Permit Shield:

The New Source Performance Standard listed above has been reviewed and it has been determined that it is not applicable to this stationary source. The following discussion details the determination of this permit shield for specific emission units at the stationary source. All of the units below burn natural gas as the primary fuel and burn fuel oil only during natural gas curtailment.

Six (6) 20.0 MMBTU/Hr Steam Generators (Unit Nos. 0, 1, 2, 3, 4, 5)
All of these steam generators were originally constructed prior to June 9, 1989. Authority to Construct No. 0010-100, issued on March 25, 1991, allowed for modifications to each of these steam generators to meet the emission limitations of Rule 74.15, "Boilers, Steam Generators, and Process Heaters". Pursuant to 40 CFR Part 60.14.e.5, this change did not fit the definition of a modification subject to New Source Performance Standards since this was "the addition or use of any system or device whose primary function is the reduction of air pollutants."

One (1) 20.0 MMBTU/Hr Erie City Boiler
This boiler was originally constructed prior to June 9, 1989. Authority to Construct No. 0012-110, issued on August 13, 1990, allowed for modifications to this boiler to meet the emission limitations of Rule 74.15, "Boilers, Steam Generators, and Process Heaters". Pursuant to 40 CFR Part 60.14.e.5, this change did not fit the definition of a modification subject to New Source Performance Standards since this was "the addition or use of any system or device whose primary function is the reduction of air pollutants."

One (1) 20.0 MMBTU/Hr Natco Crude Oil Heater
This crude oil heater was originally constructed after June 9, 1989. Authority to Construct No. 0012-110, issued on August 13, 1990, allowed for the installation of this unit as a replacement for two existing units as a strategy to meet the emission limitations of Rule 74.15, "Boilers, Steam Generators, and Process Heaters". The Natco Crude Oil Heater does not fit the definition of a steam generating unit as detailed in 40 CFR Part 60.41c. This unit does not heat water or any other heat transfer medium. Nor is it a process heater that heats a material to initiate or promote a chemical reaction. It is, rather,

a process heater that heats a mixture of heavy crude oil and diluent to promote their physical separation.

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12. MISCELLANEOUS FEDERAL PROGRAM CONDITIONS

This section contains miscellaneous federal program conditions that are not emission unit-specific or short-term. These federal requirements are broadly applicable requirements that apply and are enforced in the same manner for all subject emissions units or short-term activities. Permit conditions associated with these miscellaneous federal program requirements are listed in an individual attachments. The attachment is identified with the label "Attachment 40CFR(Part No.) __" in the lower left corner of each attachment.

Ventura County Air Pollution Control District
40 CFR Part 68 Applicable Requirements
Accidental Release Prevention and Risk Management Plans

40 CFR Part 68, "List of Regulated Substances and Thresholds for Accidental Release Prevention"
Federally-Enforceable

Applicability:

This attachment applies to regulated substances that are contained in a process at this facility and that exceed the threshold quantity, as presented in 40 CFR Part 68.140. This regulation addresses the requirements of section 112(r) of the federal Clean Air Act as amended. Specifically, this attachment applies to a facility that has stated that a federal Risk Management Plan pursuant to section 112(r) is currently not required, but where flexibility is desired to preclude a permit reopening should 40 CFR Part 68 become an applicable requirement.

Conditions:

1. Should the stationary source, as defined in 40 CFR Part 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in Part 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70.

Ventura County Air Pollution Control District
40 CFR Part 82 Applicable Requirements
Protection of Stratospheric Ozone

40 CFR Part 82, "Protection of Stratospheric Ozone"
40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners"
40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction"
Federally-Enforceable

Applicability:

This attachment applies to activities conducted at this facility that involve producing, importing, exporting, or consuming of the specified controlled substances described under 40 CFR Part 82.4. Specifically, this attachment includes the requirements of 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners", and 40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction".

As defined in 40 CFR Part 82.30, 40 CFR Part 82, Subpart B applies to any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner.

As defined in 40 CFR Part 82.150, 40 CFR Part 82, Subpart F applies to any person servicing, maintaining or repairing appliances, except for motor vehicle air conditioners. This subpart also applies to persons disposing of appliances, including motor vehicle air conditioners An appliance is any device which uses a class I or class II substance as a refrigerant and which is used for household or commercial purposes, including any air conditioner, refrigerator, chiller, or freezer.

Conditions:

1. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners".

   The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

2. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee is subject to all of the applicable requirements as specified in 40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction".

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13. TITLE V PERMIT APPLICATION PACKAGE

The Part 70 permit application, which was submitted by this facility, is included in this section for reference only and is not a part of the Part 70 permit. During the processing of the permit application, additional information was submitted by the facility in response to District requests. This additional information is also contained in this section of the permit.

The permit application is presented as submitted by the facility. Additional information received after the application was deemed complete is contained as a separate section at the end of the application. This additional information is accompanied by a TVAF-60 "Modification to Part 70 Permit Application" form and has also been copied and placed in its designated section in the original permit application package. Pages copied on "green" paper are new or modified submittals. If a new page has replaced an existing page, the existing page has been stamped "REPLACED". Any page that has been identified for removal, has been removed from the original application and has been placed in a "REMOVED" section near the end of the application.

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